

EXHIBIT 13

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- o O o -

I N D E X

NORMAN L. JONES	Page
EXAMINATION BY MR. ANTONUCCI	8
EXAMINATION BY MS. BAUGHMAN	275
EXAMINATION BY MR. ANTONUCCI	283
EXAMINATION BY MS. BAUGHMAN	285

-oOo-

E X H I B I T S

No.	Description	Page
Exhibit 1	Notice of Deposition of and Request For Production of Documents to Norman L. Jones	15
Exhibit 2	ATSDR Chapter A: Summary of Findings	54
Exhibit 3	ATSDR Chapter F: Simulation of the Fate and Transport of Tetrachloroethylene (PCE)	54
Exhibit 4	Rebuttal Report	54

1		Regarding Tarawa Terrace	
2		Flow and Transport Model	
3		Post-Audit dated January	
4		14, 2025	
5	Exhibit 5	Exhibit 2, Resume for	55
6		Norman L. Jones	
7	Exhibit 6	Tarawa Terrace Flow and	59
8		Transport Model	
9		Post-Audit dated October	
10		25, 2024	
11	Exhibit 7	Rebuttal Report	64
12		Regarding Tarawa Terrace	
13		Flow and Transport Model	
14		Post-Audit dated January	
15		14, 2025	
16	Exhibit 8	CE 547 - Brigham Young	97
17		University Groundwater	
18		Modeling Concepts	
19		PowerPoint	
20	Exhibit 9	ATSDR Chapter A: Summary	119
21		of Findings	
22	Exhibit 10	Letter dated February	150
23		13, 2025 from Devin	
24		Bolton, with attachment	
25	Exhibit 11	ATSDR Chapter F:	161

1		Simulation of the Fate	
2		and Transport of	
3		Tetrachloroethylene	
4		(PCE)	
5	Exhibit 12	Exposure to Contaminants	166
6		in Water Supplies at	
7		Camp Lejeune	
8	Exhibit 13	Time Issues	187
9	Exhibit 14	Augmenting Sparse	207
10		Groundwater Level Data	
11		with Earth Observations	
12		vis Machine Learning	
13	Exhibit 15	CE En 547 - Exam #2 Key	213
14		Sample	
15	Exhibit 16	Response to the	227
16		Department of the Navy's	
17		Letter on: Assessment of	
18		ATSDR Water Modeling for	
19		Tarawa Terrace	
20	Exhibit 17	New River MCAF, NC	259
21		Spreadsheet	
22	Exhibit 18	An overview of current	269
23		applications,	
24		challenges, and future	
25		trends in distributed	

process-based models in
hydrology

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1 February 14, 2025

9:13 a.m.

2 P R O C E E D I N G S

3 THE VIDEOGRAPHER: Good
4 morning. We are going on the record
5 at 9:13 a.m. on February 14, 2025.
6 This is Media 1 deposition recording
7 of Dr. Norman Jones, In the Matter of
8 Camp Lejeune Water Litigation filed in
9 the District Court for the Eastern
10 District of North Carolina, Case
11 Number 7:23-CV-00897.

12 This deposition is being held
13 at the Attorney General's Office in
14 Salt Lake City, Utah.

15 My name is McKayla Largin. I'm
16 the videographer. And Vickie Larsen
17 is the court reporter.

18 Will counsel please state who
19 they represent for the video record.

20 MR. ANTONUCCI: Giovanni
21 Antonucci for the United States.

22 MS. SILVERSTEIN: Kailey
23 Silverstein for the United States.

24 MR. ANWAR: Haroon Anwar for
25 the United States.

1 MS. BAUGHMAN: Laura Baughman
2 for the plaintiffs.

3 MS. BOLTON: Devin Bolton for
4 the plaintiffs.

5 THE VIDEOGRAPHER: Will the
6 court reporter please swear in the
7 witness.

8 NORMAN L. JONES,
9 called as a witness, having been duly sworn,
10 was examined and testified as follows:

11 EXAMINATION

12 BY MR. ANTONUCCI:

13 Q. All right. Good morning.

14 A. Good morning.

15 Q. Please state your full name.

16 A. Norman Lovell Jones.

17 Q. And can you please state your
18 current address.

19 A. 4174 North 430 East, Provo,
20 Utah.

21 Q. Well, good morning, Dr. Jones.
22 My name is Giovanni Antonucci, as you just
23 heard. I'm an attorney for the Department of
24 Justice. I represent the United States in
25 the Camp Lejeune Water Litigation that's

1 currently pending in the District Court for
2 the Eastern District of North Carolina.

3 Dr. Jones, have you ever had
4 your deposition taken before?

5 A. Yes.

6 Q. How many times have you had
7 your deposition taken before?

8 A. Once.

9 Q. And what was the nature of the
10 case in which you were deposed?

11 A. I was the class representative
12 on a class action lawsuit against the Traeger
13 company. And I can't remember the exact
14 date, a year and a half, two years ago, I had
15 a seven-hour deposition as part of that.

16 Q. Is the Trager company the same
17 company that manufactures grills?

18 A. Yes.

19 Q. Okay. All right. We'll come
20 back to discuss that, but I'd like to get
21 through a few more sort of ground rules, if
22 that's all right with you.

23 A. Sure.

24 Q. So you just took an oath;
25 right?

1 A. Right.

2 Q. Do you understand the nature of
3 that oath?

4 A. Yes.

5 Q. That oath requires you to fully
6 answer each question. If you're not sure of
7 an answer or don't have a complete answer,
8 you must still answer the question to the
9 extent that you can.

10 Do you understand?

11 A. Yes.

12 Q. As you can see, a court
13 reporter is taking down everything that we
14 say. Because she can only record words, it's
15 important that you answer questions verbally.

16 For example, you must say "yes"
17 are or "no" rather than shaking or nodding
18 your head. Do you agree to do that?

19 A. Understood, yes.

20 Q. Please speak at a slow pace so
21 that the court reporter can record
22 everything. I will do my best to do the
23 same.

24 We should also try not to
25 interrupt one another; otherwise, our court

1 reporter will not be able to record us
2 accurately.

3 Please wait until I finish my
4 question before you start to answer, and I
5 will not interrupt you while you are
6 speaking.

7 Sound good?

8 A. Sounds great.

9 Q. Once the deposition is
10 complete, you'll be given an opportunity to
11 read a transcript of your testimony and make
12 any corrections. You will then be asked to
13 sign it.

14 Is that all right with you?

15 A. Sounds great.

16 Q. Dr. Jones, only you are
17 testifying today. You must answer to the
18 best of your ability and you may not ask
19 others for their help.

20 Do you understand?

21 A. Yes.

22 Q. If you don't understand one of
23 my questions, please let me know and I will
24 try to clarify. However, if you don't ask
25 for clarification, I will assume that you

1 understood the question; is that fair?

2 A. Yes.

3 Q. During the deposition you may
4 hear other attorneys say "objection" and
5 state an objection. Unless you've been
6 instructed not to answer the question, please
7 answer the question after the objection has
8 been made.

9 Do you understand?

10 A. Understood, yes.

11 Q. Is there any reason why you're
12 unable to give your most truthful and
13 accurate testimony today?

14 A. No.

15 Q. Is there any reason your memory
16 might be impaired today?

17 A. No.

18 Q. Have you taken or do you intend
19 to take today any medication that might
20 affect your ability to testify accurately or
21 honestly?

22 A. No.

23 Q. Dr. Jones, you can ask for a
24 break at any time. Please don't hesitate to
25 ask for breaks. All I ask is that you answer

1 any question that's pending before we go on
2 the break.

3 Does that sound good?

4 A. Sounds good.

5 Q. Am I correct that you've been
6 retained by plaintiff's leadership group as
7 an expert witness in the In Re: Camp Lejeune
8 Water Litigation pending in the United States
9 District Court for the Eastern District of
10 North Carolina?

11 A. Yes.

12 Q. When were you hired as an
13 expert witness?

14 A. September of 2024.

15 Q. Do you remember the specific
16 date?

17 A. I don't remember the exact
18 date. Earlier in the month, I believe.

19 Q. And who hired you?

20 A. The -- the Bell Legal Group, I
21 think it's called.

22 Q. Okay. Were you dealing with
23 attorney Kevin Dean at that time?

24 A. Yes.

25 Q. Before you were retained, had

1 you ever heard about Camp Lejeune?

2 A. I'd heard of it, yes.

3 Q. Had you heard of the existence
4 of the camp in general, or more specifically
5 the water contamination issues?

6 A. I'd heard -- I was aware of the
7 existence of the camp, and I was aware that
8 there was some groundwater contamination at
9 the camp, and there was some -- there was --
10 yeah, I was aware that it was being studied
11 and analyzed.

12 Q. How did you become aware of the
13 water contamination?

14 A. You know, I -- I'm not sure I
15 remember. One of those things that I recall
16 knowing vaguely about it, but I never
17 investigated it deeply prior to that time.

18 Q. Do you recall when you first
19 learned about the water contamination issues
20 at Camp Lejeune?

21 A. No, I don't.

22 Q. Was it prior to 2022?

23 A. I don't think so, but I can't
24 be sure.

25 Q. Is it possible you learned

1 about the issues from attorney advertising?

2 MS. BAUGHMAN: Objection.

3 Form.

4 THE WITNESS: I can't say. I
5 don't remember.

6 Q. BY MR. ANTONUCCI: Sure. Had
7 you heard about Camp Lejeune in your
8 professional capacity?

9 A. Again, I -- I don't recall. I
10 didn't know a lot about it, so it's hard for
11 me to pin down where I -- where I heard about
12 it. Just was vaguely aware that there was a
13 groundwater contamination issue there.

14 MR. ANTONUCCI: Okay. I am
15 going to ask that Exhibit 1 be marked
16 for identification.

17 (Exhibit 1 was marked for identification.)

18 Q. BY MR. ANTONUCCI: Dr. Jones,
19 please take a moment to look that over.

20 A. Okay.

21 Q. Have you finished reviewing
22 Exhibit 1?

23 A. Yes.

24 Q. Have you seen this document
25 before?

1 A. Yes.

2 Q. When have you seen it before?

3 A. It was sent to me, I believe,
4 by email a few weeks ago.

5 Q. Okay. I'll represent to you
6 that that's the notice of deposition and
7 subpoena that I issued for your testimony
8 here today.

9 A. Okay.

10 Q. Does that generally comport
11 with your understanding?

12 A. That is what I would have
13 guessed, yes.

14 Q. Okay. I'd appreciate it if you
15 could turn to Attachment A, which is towards
16 the end of the document.

17 So Attachment A states
18 "Pursuant to Federal Rules of Civil Procedure
19 39(b)(2) and 45, the United States makes the
20 following requests for the production of
21 non-privileged documents, communications, and
22 materials, including but not limited to, any
23 electronically stored information, data,
24 technical files, and photographs, within your
25 possession, custody, or control:

1 "Number 1. All emails,
2 letters, correspondence, text messages,
3 conversations, chats, voicemails, data,
4 technical files, or other communications
5 pertaining to Camp Lejeune sent or received
6 prior to your retention as an expert in this
7 matter, including but not limited to, from,
8 or with:

9 "Morris Maslia, Robert Faye,
10 Jason Sautner, David Savitz, Rene
11 Suarez-Soto, Susan Martel, Scott Williams,
12 Frank Bove, Mike Partain, Jerry Ensminger,
13 Lori Freshwater."

14 Did I read that correctly?

15 A. I believe so, yes.

16 Q. Do you have any emails,
17 letters, correspondence, text messages,
18 conversations prior to your retention with
19 any of those individuals?

20 A. Not related to Camp Lejeune.

21 Q. Do you have any emails,
22 letters, correspondence, text messages,
23 conversations, chats, voicemails, data,
24 technical files or other communications
25 pertaining to Camp Lejeune prior to your

1 retention -- excuse me -- not pertaining to
2 Camp Lejeune from prior to your retention
3 with any of those individuals?

4 A. Yes.

5 Q. May I ask who?

6 A. Morris Maslia.

7 Q. Okay. What sort of
8 communications had you had with Mr. Maslia
9 prior to your retention as an expert in this
10 case?

11 A. So -- so for several years he
12 and I both served together on a peer-review
13 panel for a research project at the
14 University of Alabama, and I was the chair of
15 that expert panel and Morris was a member of
16 the panel.

17 So in the context of reviewing
18 that research project, we had correspondence.

19 Q. Okay. Before we discuss that
20 more, is there anyone else on that list with
21 whom you've had any communications prior to
22 your retention as an expert in this case?

23 A. No.

24 Q. Other than your dealings with
25 the expert panel and Mr. Maslia, do you have

1 any other communications with him prior to
2 your retention as an expert?

3 A. No.

4 Q. Okay. So you mentioned that
5 your work with Mr. Maslia was through the
6 University of Alabama; is that right?

7 A. Yes. There's a -- a National
8 Science Foundation-funded project where the
9 principal investigators at the University of
10 Alabama, it also involves other universities,
11 Louisiana State University, University of
12 Mississippi, Auburn, a number of other
13 smaller universities.

14 Q. And you mentioned serving on
15 an -- or excuse me -- serving as the chair of
16 an expert panel on which Mr. Maslia also
17 served; is that right?

18 A. That's correct.

19 Q. What were you evaluating?

20 A. So based on the rules and
21 protocols for that grant established by the
22 National Science Foundation, they were
23 required to, every year, bring in an outside
24 panel to review their work to give feedback,
25 make sure they're following good research

1 standards and making good progress.

2 And so once a year we would
3 read the report that they had generated, and
4 then we would travel to Alabama and
5 participate in a two-day workshop,
6 presentations, and then we would write a
7 report with recommendations and observations
8 we make during the review process, and we did
9 that three times.

10 Q. Okay. So you've mentioned
11 providing feedback, ensuring good research
12 standards, and good progress?

13 A. Yes.

14 Q. What is the project that you
15 were evaluating for those criteria?

16 A. It was a very broad project,
17 but the primary objective was to do research
18 on groundwater in -- in the Southeast United
19 States. Looking at groundwater recharge,
20 looking at evaluating groundwater storage
21 change, things like that.

22 And they also used, developed,
23 and applied some groundwater models as part
24 of the project.

25 Q. So my understanding of recharge

1 and storage change is that those are
2 parameters that pertain to the amount of
3 water contained in an aquifer; is that right?

4 A. Yeah, recharge is typically the
5 water that comes from rainfall that as a
6 portion of that eventually percolates down
7 and enters the aquifer. It's the primary
8 source of water to an aquifer.

9 And then the storage change
10 is -- it's dependent on the water balance,
11 how much water is coming in versus how much
12 water is being discharged to springs and
13 streams and being pumped out by wells.

14 Q. And you mentioned this was the
15 Southeast United States. Was this the
16 Floridian aquifer?

17 A. They studied, I know, aquifers
18 in Mississippi and Alabama, and there was a
19 very large model built in the state of
20 Louisiana by the researchers from Louisiana
21 State University.

22 Q. What was the purpose of the
23 applied groundwater models that they were
24 developing?

25 A. Partially to look at storage

1 change and aquifer sustainability. And,
2 again, determination of recharge rates was
3 one of the things that was studied.

4 And they're also looking at, I
5 believe, innovative numerical algorithms and
6 methods for analyzing aquifers, determining
7 recharge rates.

8 For example, the -- they used
9 not just in-situ data from monitoring wells,
10 but earth observations from satellite data.

11 Q. So I'd like to sort of break
12 that down a little bit more with you.

13 A. Sure.

14 Q. You mentioned that the purpose
15 of evaluating storage change and recharge is
16 to evaluate aquifer sustainability; am I
17 stating that correctly?

18 A. That's one of the purposes,
19 yes.

20 Q. Okay. What are the other
21 purposes?

22 A. To -- water resource planning.
23 When your -- groundwater is one of our most
24 significant sources of fresh water. For
25 example, in a drought when the stream flow is

1 low, sometimes you pump more groundwater to
2 make up that deficit, so it's a -- it's a
3 large, underground reservoir.

4 So much of the work we do in
5 groundwater studies is to assess how our
6 groundwater storage is changing over time and
7 how to characterize that and how to predict
8 how it will respond in the future, and that
9 happens to be one of my -- one of my areas of
10 research as well.

11 Q. So if I'm understanding
12 correctly, the purpose of this project at the
13 University of Alabama was, at least in part,
14 to assess sustainability for planning
15 purposes; is that right?

16 A. That's one of the objectives,
17 that's right.

18 Q. Okay. Can you please list the
19 other objectives.

20 A. You know, it's been almost two
21 years since our last review, so I'm not sure
22 I could add much beyond what I've stated in
23 terms of detail without looking up the
24 reports and reviewing it.

25 Q. Sure.

1 A. You know, and a big part of the
2 project is also public education and
3 outreach. So they -- they had a lot of
4 funding to -- to work with K through 12 and
5 provide high school science teachers, for
6 example, with material and understanding
7 aquifers and aquifer dynamics.

8 And so it -- it was a -- it was
9 a very broad project. They looked at machine
10 learning algorithms for different kinds of
11 data analysis related to groundwater data.
12 It was very broad.

13 They had, I think, maybe as
14 many as 80 people on this project. It was
15 one of the bigger research projects I've ever
16 seen.

17 Q. What was the process like to be
18 selected as the chair of the expert panel?

19 A. I -- so I was the princ- --
20 this grant was through what's called the
21 EPSCoR project, E-P-S-C-O-R, the EPSCoR
22 program through the National Science
23 Foundation.

24 And from 2010 to 2014 I
25 happened to be the principal investigator of

1 an EPSCoR grant, a \$6 million EPSCoR grant
2 featuring Brigham Young University,
3 University of Utah, Utah State University,
4 and University of Wyoming.

5 And the -- the principal
6 investigator of the project centered in
7 Alabama. It was an associate of mine and he
8 was aware of that and thought that my
9 experience and also my general background and
10 experience in groundwater would -- would make
11 me a -- a good pick for that role.

12 Q. And do you know how any of the
13 other panel members were selected?

14 A. They were selected by the --
15 they were asked to serve on behalf of the
16 principal investigator of that project, which
17 is Prabhaker Clement.

18 Q. You mentioned previously that
19 part of the objective of the expert panel was
20 to provide feedback, evaluate research
21 standards, and ensure good progress?

22 A. Yeah.

23 Q. Am I stating that correctly?

24 A. Right.

25 Q. What kinds of -- of research

1 standards were you looking for in this
2 project?

3 A. Well, they would make
4 presentations on -- on their findings and the
5 methodologies they were using, review journal
6 articles that they had published or in the
7 process of working on and, you know, in some
8 cases we would give advice on -- on
9 methodology, suggestions on -- on different
10 kinds of computer algorithms to help, you
11 know, based on our experience.

12 But, overall, it was a very
13 impressive project and they -- they've been
14 doing excellent work.

15 Q. You mentioned --

16 A. So we didn't -- we didn't -- I
17 don't recall any highly critical feedback
18 that we gave. Fortunately, it's a really --
19 really well-run project.

20 Q. So you just mentioned
21 evaluating the methodology; is that correct?

22 A. Yeah.

23 Q. How did you go about evaluating
24 the methodology of this groundwater modeling
25 project?

1 A. We would review the reports
2 that they provided, the papers that they
3 were -- that they had -- they were either
4 preparing to submit or publishing, and two
5 days of presentations that they would make
6 each year.

7 Q. Were you provided with the
8 modeling files to evaluate?

9 A. No.

10 Q. Did you perform a post-audit of
11 any kind of their work?

12 A. No.

13 Q. I'd like for you to sort of
14 walk me through the process of evaluating the
15 methodology of a groundwater modeling
16 project --

17 A. Sure.

18 Q. -- if that's all right.

19 A. Yeah.

20 Q. I guess maybe we can start with
21 the conceptual model.

22 A. Yeah.

23 Q. My understanding is that's kind
24 of where modeling begins; is that right?

25 A. That's right.

1 Q. So what did you do to evaluate
2 the conceptual model of this project from the
3 University of Alabama?

4 A. Well, there's not one model,
5 there were -- there were multiple models.
6 The -- they provided a general description of
7 the conceptual model, and for the Louisiana
8 model there was a presentation and some
9 written material where they described the
10 basic components of the conceptual model.

11 Q. Did your evaluation of the
12 conceptual model involve evaluating the
13 purpose for which the model was designed?

14 A. They -- they described the
15 purpose, I believe, that -- in -- in -- for
16 the Louisiana model, it was to look at water
17 availability and long-term, again,
18 sustainability, water balances.

19 Q. And, again, that's for planning
20 purposes; right?

21 A. But that's -- I'm going by
22 memory. I'm quite sure that's what it was,
23 but it's been a while.

24 Q. Of course. Completely
25 understandable.

1 The -- what you just stated,
2 the evaluating sustainability and planning
3 purposes. My understanding is that your
4 primary memory of what the projects are for
5 as it stands today is that it was a planning
6 project; is that right?

7 A. They -- I -- what -- from what
8 I recall, it's been a while, it was develop a
9 very sophisticated model of the aquifers in
10 Southern Louisiana to characterize the
11 groundwater flow and the long-term changes in
12 groundwater storage --

13 Q. And it was --

14 A. -- and then the dynamics of the
15 aquifer.

16 Q. Excuse me. I didn't mean to
17 cut you off.

18 That was to determine the
19 future availability of groundwater?

20 A. It's one of the objectives, I
21 believe, yes.

22 Q. Okay. And you can't remember
23 any other objectives today?

24 A. No.

25 MS. BAUGHMAN: Objection.

1 Form.

2 Q. BY MR. ANTONUCCI: All right.
3 You mentioned there were multiple models that
4 you were evaluating. Can you provide a
5 general overview of what those models were.

6 A. I don't remember the other
7 cases as well. I'm not sure there were
8 models as much as aquifer studies. That's
9 the one I remember most, because it was the
10 most significant model, Louisiana model. I'm
11 not sure I could comment on the others. My
12 memory is more fuzzy with regard to that.

13 Q. Okay. Moving on from the
14 conceptual model. Did you evaluate their
15 selection of a mathematical model?

16 A. I know they -- they used
17 MODFLOW.

18 Q. Okay. Are there different
19 options for equations -- governing equations
20 that can be used in MODFLOW?

21 A. No. There's one governing
22 equation that the model is built around.

23 Q. Okay. Did you evaluate the
24 process of model calibration?

25 A. That was part of what they

1 presented, yes.

2 Q. Okay. What factors did you
3 look at when evaluating calibration?

4 A. Just -- I -- I don't remember
5 the details. I remember they -- they did an
6 extensive calibration process, but it seemed
7 fairly standard, as I recall.

8 Q. Do you know if they used
9 perimeter estimation tools?

10 A. I don't remember for sure, but
11 I believe they did. It's fairly typical to
12 use automated parameter estimation on a large
13 model like that.

14 Q. Is it also typical to do some
15 manual parameter estimation as well?

16 A. Oh, yes. Yeah, always.

17 Q. Do you generally start with
18 manual parameter estimation?

19 A. In general --

20 MS. BAUGHMAN: Objection.

21 Form.

22 THE WITNESS: It's generally
23 good practice to start with manual
24 calibration before you engage the use
25 of software to help calibrate a model.

1 Q. BY MR. ANTONUCCI: My
2 understanding is that one of those software
3 codes is called PEST for parameter
4 estimation; is that right?

5 A. That's correct.

6 Q. That was created by John
7 Doherty?

8 A. That's correct.

9 Q. Do you know if the model you
10 evaluated used the PEST code?

11 A. I don't recall.

12 Q. What other factors did you
13 evaluate for in your analysis of their
14 calibration?

15 A. I don't recall.

16 Q. Did you evaluate the
17 sensitivity analysis performed by the
18 investigators of the study?

19 A. I don't recall.

20 Q. Is it typical to analyze the
21 sensitivity analysis of a groundwater model
22 when reviewing the methodology?

23 MS. BAUGHMAN: Objection.

24 Form.

25 THE WITNESS: Will you state

1 that again.

2 Q. BY MR. ANTONUCCI: Sure.

3 I'll -- I'll restate my question.

4 When you are evaluating a
5 groundwater model's methodology, is it
6 typical to evaluate the sensitivity analysis?

7 MS. BAUGHMAN: Objection.

8 Form.

9 THE WITNESS: If -- if they
10 performed a sensitivity analysis, you
11 would review that, yes.

12 Q. BY MR. ANTONUCCI: Okay. So
13 based on that answer, it seems like it's not
14 a guarantee that a sensitivity analysis will
15 be done for every model; is that right?

16 A. Not necessarily.

17 Q. Okay.

18 A. Yeah.

19 Q. How about uncertainty analysis?
20 Is that typically done for most models?

21 A. It is done for some models.

22 Q. Okay. What factors do you look
23 at when you're evaluating uncertainty
24 analysis?

25 MS. BAUGHMAN: Objection.

1 Form.

2 THE WITNESS: When I'm -- when
3 you're performing a sensitivity
4 analysis on the model? Is that the
5 question?

6 Q. BY MR. ANTONUCCI: I'm asking
7 now about as a peer reviewer --

8 A. Yeah.

9 Q. -- when you're evaluating the
10 methodology of a groundwater model, you're
11 looking at the uncertainty analysis. What
12 factors do you look at?

13 MS. BAUGHMAN: Objection.

14 Form.

15 THE WITNESS: The methodology
16 they use to perform the uncertainty
17 analysis.

18 Q. BY MR. ANTONUCCI: Can you
19 elaborate on that? What -- what are the sort
20 of --

21 A. Well --

22 MS. BAUGHMAN: Objection.

23 Form.

24 THE WITNESS: There are
25 different ways one can go about an

1 uncertainty analysis, but the general
2 process is typically basically the
3 same from one case to another.

4 Q. BY MR. ANTONUCCI: Okay. Can
5 you explain that general process.

6 A. Well, typically one would first
7 calibrate a model to come up with a best
8 estimate of the parameters of the model and
9 the features of the model that reproduce
10 the -- the behavior exhibited by the aquifer
11 in the field.

12 And then -- then you look at
13 your parameters and for -- for the selected
14 set of parameters, you look at the
15 uncertainty in that parameter typically with
16 the use of a probability distribution
17 function.

18 And then to perform the
19 uncertainty analysis, you generate a large
20 number of model instances, versions of the
21 model. In each case where -- for the
22 parameters you've selected, you perturb the
23 parameter value within the range of values
24 you determined would be reasonable to expect
25 for that parameter.

1 And that gives you a -- a
2 number of models. And if you do it right,
3 each of those models are considered equally
4 probable.

5 And then you run your
6 simulation for each of those, and then you
7 evaluate the outcome you're looking at, and
8 then you can get that -- that allows you to
9 get a probability of a certain outcome or a
10 confidence interval for a range of outcomes,
11 and this is often called a Monte Carlo
12 process.

13 Q. The uncertainty analysis is
14 evaluating the probability of all possible
15 model solutions; is that right?

16 A. Of a range of model solutions
17 that are considered to be likely or probable
18 as being -- or considered to be possible.
19 Variations of the model.

20 Q. All right. Thank you. I
21 didn't mean to sidetrack the discussion so
22 much with that. I appreciate you providing
23 that information. You can put Exhibit 1 to
24 the side, please.

25 What did you do to prepare for

1 your deposition today, Dr. Jones?

2 A. I primarily reviewed the -- the
3 ATSDR reports and our model reports.

4 Q. I see that you have some stacks
5 of paper in front of you; is that right?

6 A. Yeah.

7 Q. What are those?

8 A. I have Chapter A, ATSDR
9 Chapter A. Chapter F. And then I have a
10 copy of the rebuttal report that Jeff Davis
11 and I submitted in January of this year.

12 Q. And I see those are tabbed with
13 sticky notes; is that right?

14 A. That's correct.

15 Q. What sections did you tab in
16 Chapter A?

17 A. I put some tabs in for some
18 figures that I thought -- primarily figures I
19 thought might be useful that I think are
20 important in the -- in the analysis -- in the
21 review of the work, one of which is
22 Figure A18, Chapter A. Another of which is
23 A26 in Chapter A.

24 And in Chapter F I have tagged
25 Figure F12, the scatter plot simulated versus

1 observed for the MT3DMS model. Page F34
2 which shows the -- the time series of PCE at
3 Well TT-26 versus the observed values. And
4 F43, which is the simulated and observed
5 concentrations at the Tarawa Terrace water
6 treatment plant.

7 Q. Did you make any handwritten
8 notes in those?

9 A. No.

10 Q. Did you make any highlights?

11 A. No.

12 Q. Did you do anything other than
13 tab those documents?

14 A. No.

15 Q. And I see you also have the
16 rebuttal report; is that right?

17 A. Yes. In the rebuttal report I
18 have tagged the "Summary of Opinions" page, I
19 have tagged at the beginning of the figures
20 page and -- or excuse me -- the figure
21 section in case I want to refer to some of
22 the figures. Specifically Figure 2 and
23 Figure 5.

24 And then I've tagged the --
25 where the maps of the contaminant plumes

1 begin in the Appendix A7.

2 Q. Did you make any notes in your
3 copy of the rebuttal report?

4 A. No.

5 Q. Did you make any highlights?

6 A. No.

7 Q. Did you do anything other than
8 tab the pages you just mentioned?

9 A. No.

10 Q. So, Dr. Jones, I'm sorry to do
11 this, but I'm going to ask you to put those
12 to the side to --

13 A. Okay.

14 Q. -- ensure we're looking at the
15 same copies of the documents today.

16 A. That's fine.

17 Q. Thank you. I appreciate that.

18 MS. BAUGHMAN: But obviously if
19 he wants to refer to his copies, he
20 can.

21 MR. ANTONUCCI: We're going to
22 use the copies that were produced.

23 MS. BAUGHMAN: He can refer to
24 his tabbed copies if he wants to.

25 MR. ANTONUCCI: We can tab the

1 produced copies at a break.

2 MS. BAUGHMAN: Norm, you can --
3 you can look at your version if you
4 want to, if it's helpful. It's the
5 same thing.

6 MR. ANTONUCCI: All right, then
7 I'm going to ask that those be marked
8 as exhibit.

9 MS. BAUGHMAN: That's fine.

10 MR. ANTONUCCI: All right.

11 Q. So other than reviewing those
12 documents which you've tabbed, have you done
13 anything else to prepare for your deposition?

14 A. Just discussed with the legal
15 team the format and what to expect. The
16 procedure and methodology.

17 Q. When you say "legal team," are
18 you referring to Ms. Baughman and Ms. Bolton?

19 A. That's correct.

20 Q. Are you also referring to
21 Mr. Dean?

22 A. No -- there were -- I guess he
23 was briefly involved in some of the
24 discussions, yeah. Yeah, he was involved.

25 Q. Were there any other attorneys

1 you spoke with?

2 A. Not that I recall, no.

3 Q. Was anyone else present at
4 those meetings?

5 A. Jeff Davis.

6 Q. Was Mr. Davis present for every
7 meeting you had with the legal team?

8 A. No. Most of them.

9 Q. Other than Mr. Davis, was
10 anyone else present?

11 A. No.

12 Q. Approximately how many times
13 did you meet with the legal team to prepare
14 for this deposition?

15 A. We met on Monday -- or excuse
16 me, I'm sorry -- Wednesday of this week. We
17 had dinner on Tuesday night. Had dinner last
18 night.

19 Q. Approximately how long was your
20 Wednesday meeting?

21 A. Six or seven hours, I would
22 guess.

23 Q. Okay. What did you discuss in
24 that meeting?

25 A. Again, what to -- how -- how a

1 deposition works. What -- what types of
2 questions would -- we would expect to be
3 asked. Don't talk over the question when
4 it's being asked. Allow time for -- don't
5 start speaking too soon. Allow time to make
6 an objection, if necessary.

7 A lot of procedural coaching
8 like that.

9 Q. Was there anything else?

10 A. Just a general review of the
11 case and rebut- -- our opinions, and so
12 forth.

13 Q. Were you provided with any
14 documents in those meetings?

15 A. I don't recall, no.

16 Q. All right. Have you reviewed
17 any of the other depositions taken in this
18 case?

19 A. I reviewed the prelim- -- the
20 draft transcript of the Mustafa Aral
21 deposition that was taken recently. And I
22 was on the Zoom yesterday. I watched most,
23 but not all, of the Jeff Davis deposition.

24 Q. Have you reviewed any other
25 depositions that have been taken in the Camp

1 Lejeune Justice Act litigation?

2 A. No.

3 Q. So you mentioned testifying in
4 a deposition. I'm interested, have you ever
5 testified at trial?

6 A. I testified at a court hearing
7 in the -- in Carson City, Nevada, in front of
8 the state engineer as part of a water rights
9 dispute on two occasions where I was put
10 under oath and questioned as an expert
11 witness.

12 Q. Did you prepare a report in
13 those cases?

14 A. Yes.

15 Q. But you weren't deposed?

16 A. I was not deposed, no.

17 Q. So you mentioned it was a water
18 rights dispute. Can you --

19 A. Yes.

20 Q. -- explain in laymen's terms
21 what that means.

22 A. So the -- the City of Las Vegas
23 back in the 1980s decided that they needed to
24 do something to ensure long-term water
25 availability, and this organization later was

1 renamed The Southern Nevada Water Authority,
2 it represents primarily Las Vegas, but also
3 surrounding cities.

4 And they decided to pursue a
5 groundwater development project where they
6 would drill a series of deep production wells
7 in some valleys in East Central Nevada, and
8 build 300 miles of large pipe to pump that
9 water south to Las Vegas.

10 It would have been a
11 \$15 billion project, would have taken
12 estimated 27 years to build. Would have been
13 the largest inter basin transfer in history,
14 the largest groundwater development project
15 in history, and it would, as you can imagine,
16 extract a significant amount of water from
17 these valleys.

18 And I represented a significant
19 landholder. I was -- I was retained as an
20 expert witness for a landholder in Spring
21 Valley that was one of several parties that
22 were protesting the groundwater project.

23 And, yeah, we did a bunch of
24 modeling simulations and wrote a series of
25 reports related to the impact that project

1 would potentially have on the water rights,
2 springs and streams and wells in the -- in
3 this valley.

4 Q. How long ago was that?

5 A. I started in 2010 and the
6 project -- it went on for ten years until it
7 was concluded in 2020.

8 Q. Okay. So you already mentioned
9 that you were deposed in a class action
10 lawsuit where you served as a class
11 representative. Is that suit ongoing?

12 A. It -- they've -- have --
13 there's been a settlement in the last few
14 months, so it's -- I think it's over.

15 Q. Okay. Other than that class
16 action, have you ever been involved in any
17 other litigation personally, not as an
18 expert?

19 A. Involving me? No.

20 Q. And you mentioned starting work
21 for the landholder in Spring Valley in 2010.
22 Was that your first time serving as an expert
23 witness?

24 A. No.

25 Q. When did you serve as an expert

1 witness prior to that?

2 A. Several years prior to that I
3 was retained as -- to do a review of a case
4 in Montana that a colleague of mine was
5 involved with as the primary expert witness
6 involving groundwater contamination at a --
7 at a railroad facility.

8 Q. Who was that colleague?

9 A. Willis Weight.

10 Q. And do you recall which party
11 you represented in that -- or excuse me --
12 for which party you served as a witness in
13 that case?

14 A. So Willis was hired as an
15 expert to -- on the side of some plaintiffs
16 who lived adjacent to a railroad facility,
17 Burlington Northern and Santa Fe, and their
18 contention was that contaminants had leached
19 from an unlined pond or a poorly lined pond
20 on the railroad facility and migrated under a
21 neighborhood where they -- they had some
22 drinking water wells, and that had caused
23 some -- some health damages.

24 And so Willis built a MODFLOW
25 and MT3D model simulating the migration of

1 the plume over to the property, and that was
2 entered as evidence in the case.

3 And then the railroad hired
4 Papadopoulos & Associates to -- to represent
5 their side, and they -- the expert from
6 Papadopoulos did a critical review of Willis'
7 model.

8 So I was hired to review
9 Willis' work and the Papadopoulos critique of
10 his work and then write a report, which I
11 believe became an affidavit that was entered
12 in the case.

13 Q. So that I can understand, were
14 you hired as an independent expert by the
15 court or were you hired by --

16 A. No, I was hired by the
17 plaintiff attorneys.

18 Q. Okay. So you submitted an
19 affidavit in support of the plaintiff's
20 reports; is that right?

21 A. It was based on my review of --
22 of his modeling and the critique of that,
23 yeah.

24 Q. Other than that Montana case,
25 have you served as an expert witness in any

1 other cases?

2 A. Not that I recall.

3 Q. Do you know who specifically
4 from S.S. Papadopoulos & Associates was the
5 expert in that case?

6 A. I don't. It's been a number of
7 years. No, I don't recall his name. He was
8 one of their lead modelers, very well
9 respected, I remember that.

10 Q. What was the contaminant of
11 concern in that case? The Montana case.

12 A. Boy, it's been a long time. I
13 know that it was a degreasing facility, but
14 it might have been creosote. I wish I could
15 remember. It's been probably 15, 20 years,
16 yeah.

17 Q. Do you have an opinion about
18 S.S. Papadopoulos as a firm?

19 MS. BAUGHMAN: Objection to
20 form.

21 THE WITNESS: No.

22 Q. BY MR. ANTONUCCI: And you
23 mentioned that your -- your colleague,
24 Mr. Willis, simulated the flow of
25 contamination through the -- through the

1 groundwater; is that right?

2 A. That's correct.

3 Q. And that was from the poorly
4 lined pond to water supply wells; is that
5 correct?

6 A. To the -- yes, to the area
7 downgradient from the railroad facility where
8 the water was pumped out, yeah.

9 Q. How far away from the pond were
10 the water supply wells?

11 A. It -- it wasn't a great
12 distance, but I -- I don't remember the exact
13 distance.

14 Q. Do you know the total size of
15 the area that was modeled?

16 A. I don't recall.

17 Q. And do you know what
18 information was used to, for example, to
19 select boundary conditions in that model?

20 A. I don't recall.

21 Q. Do you know what information
22 was available in terms of heads and flow
23 data?

24 A. I don't recall specifics.

25 Q. Do you know if there was heads

1 and flow data available to Mr. Willis?

2 A. I -- I believe there were, yes.

3 Q. Why do you believe that?

4 A. I -- if -- if there were not
5 any data -- I know they had concentrations at
6 the -- at the location where the water was
7 being pumped out. That was the whole basis
8 of the suit was they measured contaminants in
9 their drinking water.

10 Q. When you say "the location
11 where the water was pumped out," are you
12 referring to the supply wells, the water
13 treatment plant, or the tap?

14 A. I don't believe a water
15 treatment plant was involved. There were --
16 I -- from -- from what I recall, there were
17 some small wells. I believe it was actually
18 a -- part of a -- an Indian reservation, and
19 they had some small water supply wells they
20 were using.

21 Q. So it sounds like those samples
22 were taken at the supply wells?

23 A. Yes, I believe so.

24 Q. Do you know approximately what
25 time span those samples covered?

1 A. I don't recall.

2 Q. Was it more than a year?

3 A. I don't recall.

4 Q. Was it less than a year?

5 A. I don't recall.

6 Q. Do you know approximately how
7 many data points they had?

8 A. I don't recall.

9 Q. Did they have -- strike that.
10 With regard to the -- the head
11 and flow data that you assumed that they had
12 available, do you know how much of that was
13 available?

14 A. I don't recall.

15 Q. Where do you -- in these kinds
16 of cases, where do modelers normally get head
17 and flow data from?

18 MS. BAUGHMAN: Objection.

19 Form.

20 THE WITNESS: Head and flow
21 data? Well, you track down water
22 level measurements from observation
23 wells. In some cases, aquifers
24 interact with streams, either
25 discharge to streams or streams leak

1 water into the ground.

2 Sometimes you can look at
3 gauges on the stream to get an
4 estimate of -- of how much water's
5 being gained or lost, but that is a
6 fairly standard part of the data
7 collection phase on the modeling
8 project is to gather all the data you
9 can find.

10 Q. BY MR. ANTONUCCI: Okay. And
11 you mentioned that it was a lawsuit brought
12 on behalf of the individuals who drank the
13 water from those wells; is that correct?

14 A. That's correct.

15 Q. Do you know if the purpose of
16 the model was to determine the absolute
17 amount of contaminants that these individuals
18 were exposed to?

19 MS. BAUGHMAN: Objection to
20 form.

21 THE WITNESS: I don't recall.
22 I know part -- at least part of the
23 purpose was to determine if, presuming
24 water leaked from the pond, would it,
25 given the groundwater flow directions

1 and the timing, is it probable that it
2 traveled -- that the contaminants were
3 transported to that location where
4 they could potentially be pumped out.

5 Q. BY MR. ANTONUCCI: So that's
6 kind of a yes-or-no question, right? Like,
7 could the contamination have gotten to the
8 well in that time period or not; right?

9 A. Yeah.

10 Q. Okay. And that's the only
11 purpose that you recall from that report?

12 MS. BAUGHMAN: Objection.
13 Form.

14 THE WITNESS: That is a purpose
15 that I recall.

16 Q. BY MR. ANTONUCCI: What other
17 purposes do you recall?

18 A. I -- I don't recall other
19 purposes.

20 Q. Okay. Okay. So prior to that
21 Montana case, had you ever served as an
22 expert witness before that?

23 MS. BAUGHMAN: In litigation?

24 MR. ANTONUCCI: Yes, in
25 litigation.

1 MS. BAUGHMAN: Object to the
2 form.

3 MR. ANTONUCCI: Have you --
4 excuse me. I'm going to ask my
5 question again.

6 Q. Prior to the Montana case, had
7 you ever served as an expert witness in
8 litigation?

9 A. I don't believe so. Not that I
10 recall.

11 Q. Okay. Do you have a list of
12 all the times you've served as an expert
13 witness somewhere?

14 A. No.

15 MR. ANTONUCCI: Okay. All
16 right. Actually, before we move on,
17 I'm going to ask that the copies that
18 you brought of the rebuttal report and
19 Chapters A and F be marked for
20 identification for Exhibits 2, 3,
21 and 4.

22 (There was a discussion held off the record.)

23 (Exhibits 2-4 were marked for
24 identification.)

25 MR. ANTONUCCI: Thank you for

1 that.

2 And now I'm going to hand you
3 another document. I'll ask that this
4 be marked for identification as
5 Exhibit 5.

6 (Exhibit 5 was marked for identification.)

7 Q. BY MR. ANTONUCCI: Please let
8 me know when you've had a chance to review
9 that document.

10 A. I'm ready.

11 Q. Okay. Do you recognize
12 Exhibit 5?

13 A. Yes.

14 Q. Okay. What is Exhibit 5?

15 A. This is the CV that I
16 submitted.

17 Q. Okay. So if you turn to Page 1
18 of Exhibit 5, it looks like this document is
19 titled "Norman L. Jones, PhD, Professor,
20 Department of Civil & Construction
21 Engineering, Brigham Young University"; is
22 that right?

23 A. Correct.

24 Q. Is this a complete and accurate
25 copy of your resum??

1 A. Yes.

2 Q. Is there anything that you
3 would like to change or add to this copy of
4 your resum??

5 A. Can you clarify what you mean
6 by "complete"?

7 Q. Sure. Is -- is this the most
8 updated iteration of your resum??

9 A. This is the resum? -- resum?
10 that I am currently using when my resum? is
11 requested.

12 Q. Okay. So I'm inferring from
13 your question that there's some things that
14 are probably left off of this resum?; is that
15 right?

16 A. That's correct. It's not
17 100 percent inclusive of everything I've done
18 in my professional career.

19 Q. Sure. What kind of things are
20 currently listed on your resum? that's marked
21 as Exhibit 5?

22 A. Oh, heavens. Consulting
23 projects, expert witness work, workshops and
24 courses I've taught, things like that.

25 Q. Have you served as a consulting

1 expert in litigation?

2 MS. BAUGHMAN: Objection to
3 form.

4 THE WITNESS: A consultant --
5 not beyond the cases we've described.

6 Q. BY MR. ANTONUCCI: Okay. Your
7 resum? mentions a bachelor's, master's, and
8 PhD in civil engineering. Did you have any
9 specialization or concentration in those
10 programs?

11 A. Yes. My master's degree and
12 PhD at the University of Texas, I specialized
13 in geotechnical engineering.

14 Q. And is there a list of your
15 peer-reviewed publications from the last ten
16 years on Page 3 of this resum??

17 A. Yes.

18 Q. How many of these publications
19 deal with groundwater flow modeling?

20 A. You'll have to give me a
21 minute. I would say of these, six are --
22 five or six are directly related to a
23 groundwater flow model and -- but a large
24 number of them are for characterizing
25 groundwater conditions, groundwater

1 sustainability.

2 Q. And how many of those deal with
3 contaminant fate and transport modeling?

4 A. I'm not sure in this period --
5 I got to read them again. I can see at least
6 one.

7 Q. So just the one?

8 A. I believe so.

9 Q. Would it be fair to say that
10 you focus more on groundwater flow modeling
11 than contaminant fate and transport modeling?

12 MS. BAUGHMAN: Objection.
13 Form.

14 THE WITNESS: In terms of my
15 publications, yeah, I've -- my -- I've
16 done more research on -- well, in the
17 last ten years, the focus of my
18 research has been more shifted to
19 using earth observations and machine
20 learning and data analytics to analyze
21 aquifers.

22 MR. ANTONUCCI: I'd like to
23 talk to you about that more later in
24 the deposition. For now, it's been
25 about an hour, would you like to take

1 a break?

2 THE WITNESS: Sure.

3 MR. ANTONUCCI: Okay.

4 MS. BAUGHMAN: If you're -- if
5 you're willing to keep going, we can.
6 We don't have to. That's up to you.

7 THE WITNESS: I can keep going.

8 MR. ANTONUCCI: Well, I'd like
9 to take a break.

10 THE WITNESS: Sure. All right.

11 THE VIDEOGRAPHER: Off the
12 record. The time is 10:18.

13 (There was a break taken.)

14 THE VIDEOGRAPHER: We're back
15 on the record. The time is 10:28.
16 This is Media Number 2.

17 Counsel may proceed.

18 MR. ANTONUCCI: All right. I
19 am going to hand you what is being
20 marked for identification as
21 Exhibit 6.

22 (Exhibit 6 was marked for identification.)

23 MR. ANTONUCCI: Sorry, I just
24 noticed my microphone wasn't on.

25 Q. I just handed you what was

1 marked for identification as Exhibit 6.

2 Dr. Jones, this is your initial
3 expert report and materials considered;
4 right?

5 A. Correct.

6 Q. And looking at that first page,
7 the cover page, title is Tarawa Terrace Flow
8 and Transport Model Post-Audit prepared for
9 Bell Legal Group. A couple lines down,
10 prepared by Norman L. Jones, R. Jeffrey
11 Davis.

12 Is that your signature there?

13 A. Yes.

14 Q. Okay. How do you know
15 Mr. Davis?

16 A. He was a former graduate
17 student of mine when I was a young professor
18 at Brigham Young University. And then I
19 hired him to be a staff member in our
20 research laboratory where we were developing
21 groundwater modeling software.

22 And then I worked with him in
23 that capacity for several years, and then
24 even after he left the university I -- we
25 worked together on consulting projects and

1 teaching groundwater and contaminant
2 transport modeling short courses.

3 Q. So it's fair to say that you've
4 worked together before your work on this
5 case?

6 A. Yes.

7 Q. And it appears that you
8 co-wrote this expert report; is that correct?

9 A. That's correct.

10 Q. Did you participate in the
11 drafting process with Mr. Davis?

12 A. Drafting?

13 Q. I guess can you explain to me
14 your -- your role in the preparation of this
15 report.

16 A. Yes. We decided it would be
17 beneficial to team up. I have certain
18 limitations on my time given that I'm a
19 full-time university professor, and we
20 decided that we would work together, we could
21 share the workload.

22 And so he did most of the
23 modeling work in terms of entering the data
24 into the GMS MODFLOW MT3DMS software and
25 running the model simulations.

1 I did a lot of the
2 post-processing and data analysis. Together
3 we -- we reviewed the -- the data, reviewed
4 the -- the prior publications from ATSDR, and
5 then we -- together we drafted and edited and
6 finalized this report.

7 This report also -- in the
8 preparation of the report we utilized staff
9 at Integral Consulting. For example, the --
10 the figures with the maps. We provided the
11 model results to staff members at Integral
12 and they helped do a lot of the formatting.

13 There was also a professional
14 copy editor that reviewed the documents
15 before we submitted them.

16 Q. A moment ago you mentioned that
17 Mr. Davis used GMS, which I believe
18 incorporates MODFLOW and MT3DMS; is that
19 right?

20 A. That's correct. It's what we
21 call a pre and post processing for MODFLOW
22 and MT3DMS. It -- the input files to MODFLOW
23 and MT3DMS are very large and complicated and
24 synthesize a lot of data. And so GMS was
25 developed to streamline and simplify that

1 process and encapsulate it in what we call a
2 graphical user interface.

3 It -- you can -- you can modify
4 the input files through the GMS interface,
5 for example, save the modified files, run --
6 and then GMS will then launch MODFLOW and/or
7 MT3D, and then they generate a set of output
8 files which are ingested to GMS for -- for
9 visualization plotting.

10 Q. And you and Mr. Davis developed
11 GMS for the Department of Defense; is that
12 right?

13 A. That's correct. We were -- it
14 was developed, yeah, in the early part of my
15 career.

16 Q. Okay. Turning your attention
17 back to Exhibit 6, your initial report. And,
18 by the way, if I refer to this --

19 A. Okay.

20 Q. -- as your initial report, will
21 you understand what I'm saying?

22 A. Sure.

23 Q. Okay. Do you agree with all of
24 the opinions and statements made in
25 Exhibit 6?

1 A. Yes.

2 Q. And then I'd appreciate it if
3 you could turn to the back, because I've
4 appended your materials considered list.

5 So is this a fair and accurate
6 copy of your initial report and materials
7 considered list?

8 A. Yes.

9 Q. Okay. Thank you, Dr. Jones.
10 You can put that to the side.

11 I'm now going to hand you what
12 will be marked for identification as
13 Exhibit 7.

14 (Exhibit 7 was marked for identification.)

15 MS. BOLTON: For the record, a
16 revised copy of this materials list,
17 it was served after this initial one.

18 MR. ANTONUCCI: For the
19 rebuttal report?

20 MS. BOLTON: No. This is the
21 October 2024 report, so for the
22 initial report.

23 MR. ANTONUCCI: Okay.

24 MS. BAUGHMAN: Do you want us
25 to send that to you so that you can

1 mark it or?

2 MS. BOLTON: Yeah, it includes
3 all of those, plus additional.

4 MR. ANTONUCCI: That's right.
5 Yes, if you could send it, that would
6 be great.

7 MS. BOLTON: Okay.

8 Q. BY MR. ANTONUCCI: Okay.
9 Dr. Jones, I showed you what's been marked
10 for identification as Exhibit 7. This is a
11 report titled "Rebuttal Report Regarding
12 Tarawa Terrace Flow and Transport Model
13 Post-Audit"; is that right?

14 A. That's correct.

15 Q. Is this the -- if I refer to
16 this as your rebuttal report, will you
17 understand that I'm referring to Exhibit 7?

18 A. Yes.

19 Q. Okay. And, again, it looks
20 like it says "Prepared by Norman L. Jones"
21 with your signature on the front page; is
22 that right?

23 A. Yes.

24 Q. And, again, I appended the
25 materials considered to the end of this

1 report.

2 A. Yes.

3 Q. Did you participate in the
4 drafting of this report in the same way as
5 with your initial report?

6 A. Yes.

7 Q. Were there any changes in how
8 you and Mr. Davis divided labor?

9 A. No.

10 Q. So it's fair to say you
11 undertook substantially the same process to
12 draft both reports?

13 A. That's correct.

14 Q. Do you agree with all of the
15 opinions made in Exhibit 7?

16 A. Yes.

17 Q. Do you hold every opinion in
18 Exhibit 6, that's your initial report, as
19 your own opinion?

20 A. Yes.

21 Q. Do you hold every opinion in
22 Exhibit 7, your rebuttal report, as your own
23 opinion?

24 A. Yes.

25 Q. Is there anything in either

1 report that you believe is incorrect or needs
2 updating?

3 A. Well, there were some -- can
4 you clarify what you mean by that? You mean
5 in how it's written?

6 Q. I think you might be referring
7 to the changes that were made to the
8 post-audit --

9 A. Correct.

10 Q. -- in between the initial and
11 rebuttal report; is that right?

12 A. Correct.

13 Q. So other than those changes, is
14 there anything incorrect in either report?

15 A. Not that I can think of.

16 Q. Okay. Is there anything that
17 needs to be updated in either report?

18 A. Not that I can think of.

19 Q. Is any portion of either report
20 incomplete?

21 MS. BAUGHMAN: Objection.

22 Form.

23 THE WITNESS: Not that I can
24 think of.

25 Q. BY MR. ANTONUCCI: Okay. So

1 Exhibit 6 and 7, your initial and rebuttal
2 reports, do these include all of the opinions
3 you hold regarding ATSDR's groundwater flow
4 and transport models for Marine Corps Base
5 Camp Lejeune?

6 MS. BAUGHMAN: Objection.

7 Form.

8 THE WITNESS: Can you clarify
9 what you mean by that.

10 Q. BY MR. ANTONUCCI: Do you have
11 any opinions on ATSDR's water modeling
12 efforts at Camp Lejeune that are not
13 contained in either Exhibit 6 or Exhibit 7?

14 MS. BAUGHMAN: Objection.

15 Form.

16 THE WITNESS: Yeah, I -- I'm
17 not sure I'm comfortable saying I
18 would never have any other opinions
19 than what are contained here.

20 Q. BY MR. ANTONUCCI: Sure. In
21 what sort of circumstances would -- would you
22 have a new opinion?

23 MS. BAUGHMAN: Objection.

24 Form.

25 THE WITNESS: Well, if you were

1 to ask me about specific questions
2 related to different parts of the
3 modeling that's done in Chapter A and
4 Chapter F by ATSDR, there may be
5 specific opinions about that, which
6 I'd be happy to share that it may not
7 be 100 percent included in these
8 reports.

9 Q. BY MR. ANTONUCCI: Do you
10 intend to offer any opinions that are not in
11 this case -- strike that.

12 Do you intend to offer any
13 opinions in this case that are not contained
14 in Exhibit 6 or Exhibit 7?

15 MS. BAUGHMAN: Objection.
16 Form.

17 THE WITNESS: In the context of
18 this deposition?

19 Q. BY MR. ANTONUCCI: I'm
20 referring to the entire case.

21 Do you intend to offer any
22 other opinions in this case that are not
23 contained in either Exhibit 6 or Exhibit 7?

24 MS. BAUGHMAN: Objection.
25 Form.

1 THE WITNESS: If requested by
2 our legal team, I would be willing to
3 provide additional opinions.

4 Q. BY MR. ANTONUCCI: As you sit
5 here today, do you have any additional
6 opinions about ATSDR's water modeling efforts
7 at Camp Lejeune that are not contained in
8 either Exhibit 6 or Exhibit 7?

9 MS. BAUGHMAN: Objection.
10 Form.

11 THE WITNESS: Yes, there are
12 things about their initial report that
13 I -- I would be happy to proffer as
14 opinions in this deposition that
15 aren't necessarily contained in this
16 report.

17 Q. BY MR. ANTONUCCI: Okay. Can
18 you list those for me, please.

19 A. Well, what I'm saying is in the
20 context of -- of this discussion, there may
21 be specific features in the context of the
22 Monte Carlo simulation, the -- the confidence
23 interval, the calibration exercise that may
24 not -- I'm uncomfortable saying every opinion
25 I have is exclusively contained in this.

1 Q. So -- so to be clear, then, the
2 answer is no, all of your opinions are not
3 contained in your reports?

4 MS. BAUGHMAN: Objection.

5 Form.

6 THE WITNESS: In the context of
7 what I just described, yes. I'm
8 hesitant to say everything, all of my
9 opinions are here, and then later be
10 told I can't render an opinion on
11 something because I was told all of my
12 opinions are in here, if you catch my
13 drift.

14 Q. BY MR. ANTONUCCI: Can you
15 explain why all of your opinions aren't in
16 your report?

17 A. These reports had a specific
18 purpose and we were asked to do a post-audit,
19 and then report the results of that. And
20 then we were asked to respond specifically to
21 a rebuttal to our post-audit offered by
22 Mr. Spiliotopoulos.

23 And we -- so the purpose of
24 these documents, to my understanding, was
25 very specific and focused.

1 Q. Dr. Jones, do you understand
2 that you've been retained as an expert in
3 this case?

4 A. Yes.

5 Q. Do you understand the Federal
6 Rules of Civil Procedure require you to
7 disclose a complete list of your opinions?

8 MS. BAUGHMAN: Objection.

9 Form.

10 THE WITNESS: I'm not aware of
11 that rule.

12 Q. BY MR. ANTONUCCI: Can you
13 provide me with a list of the opinions you
14 have that are not contained in your reports?

15 A. I don't have a list, no.

16 Q. Can you name a single opinion
17 you have that's not contained in your
18 reports?

19 A. I -- I would -- I would have to
20 think about that.

21 Q. Okay. We'll come back to this.

22 A. Okay.

23 Q. If you could, please turn to
24 Page 6-1 of Exhibit 6, that's your initial
25 report.

1 A. Sure.

2 Q. Page 6-1 of Exhibit 6 has the
3 heading "Conclusions"; is that right?

4 A. Correct.

5 Q. And there's a list of five
6 categories of conclusions on this page; is
7 that right?

8 A. Correct.

9 Q. Is this a complete list of all
10 the conclusions from your report?

11 MS. BAUGHMAN: Objection.

12 Form.

13 THE WITNESS: These are the
14 conclusions from our report, yes.

15 Q. BY MR. ANTONUCCI: Are there
16 any conclusions from your initial report,
17 Exhibit 6, that are not contained in this
18 list?

19 A. No.

20 Q. Am I correct in understanding
21 that this is not a complete list of all the
22 opinions you will render in this case?

23 A. It's a -- given the context of
24 what we're asked to do, this is a complete
25 list of the -- of the opinions relative to

1 this. And I've not been asked to formally
2 submit any additional opinions at this time.

3 Q. Okay. Does any part of this
4 list need to be updated?

5 A. Not --

6 MS. BAUGHMAN: Other than with
7 the rebuttal? I mean, I object to the
8 form.

9 THE WITNESS: No.

10 Q. BY MR. ANTONUCCI: Okay. And
11 now as we've already discussed, you've
12 provided a rebuttal report which modified
13 some of the conclusions from Exhibit 6; is
14 that right?

15 MS. BAUGHMAN: Object to the
16 form.

17 THE WITNESS: No, I don't
18 believe it modified the conclusions of
19 this report. I wouldn't state it that
20 way.

21 Q. BY MR. ANTONUCCI: Okay. There
22 were errors in Exhibit 6 that you corrected
23 in Exhibit 7; is that correct?

24 A. That's correct.

25 Q. Okay.

1 A. But I don't think any of those
2 errors were significant enough to change the
3 opinions rendered in the initial report.

4 Q. I understand.

5 So aside from those errors,
6 are -- is there anything else in Exhibit 6,
7 your initial report, sitting here today that
8 is incorrect?

9 A. Not that I can think of.

10 Q. Okay. All right. Now if you
11 could please flip to Page 1-1 of Exhibit 7,
12 that's the rebuttal report.

13 A. Sure.

14 Q. All right. Page 1-1 of
15 Exhibit 7, your rebuttal report, has the
16 heading "Summary of Opinions"; is that right?

17 A. Correct.

18 Q. And there's a list of six
19 opinions on Page 1-1 of Exhibit 6; right?

20 A. Correct.

21 Q. Is this a complete list of all
22 the opinions from your rebuttal report,
23 Exhibit 7?

24 MS. BAUGHMAN: Objection.

25 Form.

1 THE WITNESS: Yes.

2 Q. BY MR. ANTONUCCI: Do you have
3 any opinions regarding the content of ATSDR's
4 groundwater modeling efforts at Camp Lejeune
5 that are not contained in this list?

6 MS. BAUGHMAN: Objection.

7 Form. Asked and answered.

8 THE WITNESS: I don't think I
9 have any opinions that are
10 inconsistent with this list, no.

11 Q. BY MR. ANTONUCCI: All right.
12 Now, this is from the rebuttal report which
13 includes the corrections to your initial
14 report; is that right?

15 A. Say that again.

16 Q. We're looking at your rebuttal
17 report right now, and this --

18 A. Yes.

19 Q. -- report includes corrections
20 to your initial report; is that right?

21 A. Correct.

22 Q. Does any part of this report
23 need to be corrected?

24 A. Not that I can think of.

25 Q. Is any part of this report

1 incorrect?

2 A. Not that I can think of.

3 Q. Is there any part of this
4 report that needs to be updated?

5 A. No.

6 Q. You provided, I believe, three
7 lists of materials considered in this case;
8 is that right?

9 A. What are you referring to?

10 Q. So my understanding is that you
11 provided a list of materials considered with
12 your initial report, then an updated list of
13 materials considered with that same initial
14 report, and finally a list of materials
15 considered with your rebuttal report; is that
16 correct?

17 A. That sounds correct.

18 Q. Okay. Does that materials
19 considered list include all of the facts,
20 data, and information you considered in
21 rendering your opinions?

22 A. I believe so, yes.

23 Q. Did you review any facts, data,
24 or information not listed on your materials
25 considered lists in rendering these opinions?

1 A. Not that I recall.

2 Q. Okay. Did you review any
3 academic texts when preparing these opinions?

4 MS. BAUGHMAN: Objection.

5 Form.

6 You mean other than what's on
7 the lists?

8 Object to the form.

9 THE WITNESS: I don't recall.

10 Q. BY MR. ANTONUCCI: Are you not
11 sure if there's an academic text you've
12 referenced that aren't on your materials
13 considered list --

14 MS. BAUGHMAN: Objection.

15 Q. BY MR. ANTONUCCI: -- or in
16 your report?

17 A. I don't recall any other
18 references specifically considered that were
19 not cited in our report.

20 Q. Okay. Did you review any
21 course books or peer-reviewed articles in
22 rendering these opinions?

23 MS. BAUGHMAN: Object to the
24 form.

25 You mean other than what's

1 already referenced?

2 THE WITNESS: I -- in the
3 process of conducting the post-audit
4 and writing the review, I cited -- I
5 believe we cited all of the materials
6 that were directly referenced as part
7 of that process.

8 Now, were there other books and
9 articles through my career that I've
10 read that influenced this? Probably.
11 Things we specifically cited in terms
12 of writing this that were specifically
13 relevant, I believe we cited those.

14 Q. BY MR. ANTONUCCI: Can you
15 think of any books or articles you've read
16 through the course of your career that may
17 have influenced your opinions?

18 A. Oh, yeah, I would say I have
19 34 years of experience in groundwater and
20 contaminant transport modeling, and I've read
21 countless articles and books that form my
22 basis of knowledge and expertise in this
23 area.

24 Q. Is there any that stand out?

25 A. Not particularly.

1 Q. Okay. Have you reviewed or
2 otherwise considered any other expert reports
3 in this case?

4 A. Related to the case? I -- I've
5 reviewed the -- several other -- I've
6 reviewed the expert reports by Morris Maslia,
7 Mustafa Aral, Leonard Konikow, I believe
8 Sabatini is his name, the professor at
9 Oklahoma.

10 Those are the ones I recall off
11 the top of my head. And then of course
12 the -- the DOJ reports that were submitted.

13 Q. By "the DOJ reports that were
14 submitted," are you referring to the expert
15 report of Dr. Spiliotopoulos?

16 A. Correct.

17 Q. And the expert report of
18 Dr. Remy Hennet?

19 A. Yes.

20 Q. And the expert report of
21 Dr. Jay Brigham?

22 A. Yes.

23 Q. So you reviewed all three of
24 those?

25 A. Yes.

1 Q. You mentioned reviewing the
2 expert report of Morris Maslia; is that
3 correct?

4 A. Yes.

5 Q. Morris Maslia submitted two
6 reports in this case. Did you review both of
7 those?

8 A. Yes.

9 Q. Beginning with his initial
10 report, that was the report disclosed
11 October 25th of 2024. Do you agree with all
12 of the opinions in Mr. Maslia's report?

13 MS. BAUGHMAN: Object to the
14 form.

15 THE WITNESS: As far as I can
16 recall.

17 Q. BY MR. ANTONUCCI: And with
18 regard to Mr. Maslia's rebuttal report, that
19 was the report disclosed January 14th of
20 2025. Do you agree with all of the opinions
21 in that report?

22 MS. BAUGHMAN: Objection.
23 Form.

24 THE WITNESS: Yes.

25 Q. BY MR. ANTONUCCI: What's your

1 opinion of Mr. Maslia?

2 A. I think he's a -- a very
3 competent and experienced expert in the field
4 of groundwater flow and transport modeling.

5 Q. What's his reputation in the
6 field of groundwater flow and transport
7 modeling?

8 A. As far as I know, he's
9 respected.

10 Q. Turning to the expert report of
11 Dr. Mustafa Aral, October 25, 2024, do you
12 agree with all of the opinions in that
13 report?

14 MS. BAUGHMAN: Object. Form.

15 THE WITNESS: I believe so. I
16 can't think of anything specific that
17 I would disagree with.

18 Q. BY MR. ANTONUCCI: What's your
19 opinion of Dr. Aral?

20 A. He's a very accomplished and
21 widely respected expert in this field.

22 Q. And do you agree with all of
23 the opinions in Dr. Sabatini's report?

24 MS. BAUGHMAN: Objection.

25 Form.

1 THE WITNESS: Yes.

2 Q. BY MR. ANTONUCCI: What is your
3 opinion of Dr. Sabatini?

4 A. I don't know him very well.

5 Q. Do you know his reputation in
6 the field of groundwater modeling?

7 A. Not independent of this
8 project. I reviewed his resum? and his
9 experience and it seems very impressive.

10 Q. And did you -- did you agree
11 with the opinions stated in the expert report
12 of Dr. -- Dr. Leonard Konikow?

13 MS. BAUGHMAN: Objection.
14 Form.

15 THE WITNESS: Yes.

16 Q. BY MR. ANTONUCCI: And what's
17 your opinion of Dr. Konikow?

18 A. Well, he's -- he's one of the
19 most widely respected experts in groundwater
20 modeling.

21 Q. Okay. So would you say he has
22 a generally good reputation in the field of
23 groundwater modeling?

24 A. He has an exceptional
25 reputation.

1 Q. Okay. I'd appreciate if you
2 could turn back to Exhibit 7, and I'd like
3 for you to look at the materials considered
4 list that's at the end of Exhibit 7.

5 A. Sure.

6 Q. So I understand that there's a
7 sort of intermediate materials considered
8 list for your initial report. However, this
9 is your rebuttal report; right?

10 A. Correct.

11 Q. Is this the final materials
12 considered list for your rebuttal report?

13 A. These are the materials that we
14 cited specifically in writing the report.

15 Q. Does it also include the
16 materials you considered in review -- in
17 rendering your opinions?

18 A. No, not necessarily. For
19 example, this -- this doesn't include the --
20 the specific list at the back doesn't include
21 the DOJ reports.

22 Q. Okay. Other than the DOJ
23 reports, are there any other materials you
24 considered in rendering your opinion that's
25 not included on this list?

1 A. Not that I can think of.

2 Q. Okay. So according to this
3 list, you considered ATSDR's Tarawa Terrace
4 Chapters A, F, and C; is that correct?

5 A. Correct.

6 Q. Did you review any other
7 chapters of ATSDR's Tarawa Terrace reports?

8 A. I skimmed through some of the
9 others, but not in the same detail that I
10 read Chapters A, C, and F.

11 Q. Do you remember which others
12 you skimmed?

13 A. I don't recall.

14 Q. Do you remember the subject
15 matter of the other reports that you skimmed?

16 A. The -- I believe it may have
17 included a more detailed dive into the
18 uncertainty analysis, but I -- I can't -- I
19 couldn't specifically tell you which one. I
20 just know I looked through the others.

21 Q. Okay. You remember discussion
22 of the uncertainty analysis in the other
23 reports. Do you remember the subject matter
24 of any others?

25 A. I'm not positive on that, but I

1 believe that's the topic of one of the
2 others. I -- I couldn't specifically cite
3 the topics of the others, yes.

4 Q. Did you review others or just
5 the uncertainty analysis chapter?

6 A. Like I say, I believe I skimmed
7 through all of them, but -- just to see what
8 was there, but I -- I did not do a -- as
9 thorough a reading of those chapters as I did
10 of A, C, and F.

11 Q. Okay. So you didn't thoroughly
12 review Chapter B: Geologic Framework of the
13 Castle-Hayne Aquifer System; correct?

14 A. Correct.

15 Q. You did not thoroughly review
16 Chapter E: Occurrence of Contaminants in
17 Groundwater; is that right?

18 A. Correct.

19 Q. You didn't thoroughly review
20 Chapter G: Simulation of Three-Dimensional
21 Multispecies Multiphase Mass Transport of
22 Tetrachloroethylene (PCE) and Associated
23 Degradation Byproducts; is that right?

24 A. Correct.

25 Q. You didn't closely review

1 Chapter H: Effective Groundwater Pumping
2 Schedule Variation on Arrival of
3 Tetrachloroethylene (PCE) at Water Supply
4 Wells and Water Treatment Plants; is that
5 correct?

6 A. Correct.

7 Q. And you didn't thoroughly
8 consider or thoroughly review Chapter I:
9 Parameter Sensitivity, Uncertainty, and
10 Variability Associated With Model Simulations
11 of Groundwater Flow, Contaminant Fate and
12 Transport, and Distribution of Drinking
13 Water; is that right?

14 A. I -- I believe I may have read
15 that a little more carefully than the others,
16 but certainly not to the same depth of
17 analysis as I did to the other chapters.

18 Also, Chapter A is kind of a
19 comprehensive summary, as I understand it, of
20 all of the work that was done, including what
21 was put in those other chapters. And so I
22 felt like I had a reasonably good exposure to
23 the overall methods and processes that were
24 used and then described in more detail in
25 those chapters.

1 But for the purpose of the
2 post-audit which we were hired to do,
3 certainly the most important chapters would
4 be A, C, and F.

5 Q. Why are A, C, and F the most
6 important chapters for the post-audit you
7 were hired to do?

8 A. Because A is a -- is a
9 comprehensive summary, a detailed summary of
10 the entire modeling project. It was very
11 helpful in getting an overview of all of the
12 work that was done.

13 Chapter C provided a very
14 detailed description of the construction and
15 calibration of the MODFLOW flow model.

16 And Chapter F was a very
17 detailed description of the construction and
18 calibration, uncertainty analysis associated
19 with the contaminant transport model.

20 And we were asked to, in -- in
21 conducting the post-audit, to -- to perform
22 simulations using both the flow and transport
23 model. So they were clearly the most
24 relevant chapters for our work.

25 Q. So you weren't asked to review

1 all of the Tarawa Terrace chapters?

2 A. They were provided to us and,
3 you know, we -- we were -- we quickly
4 determined which chapters would be most
5 relevant. And it's a matter of, you know,
6 where you focus your time and effort.

7 Q. Were you provided with ATSDR's
8 reports on their water modeling efforts at
9 Hadnot Point and Holcomb Boulevard?

10 A. Yes.

11 Q. Did you review any of those?

12 A. Yes.

13 Q. Is there a particular reason
14 none of them are on your materials considered
15 list?

16 A. Because our primary focus was
17 Tarawa Terrace in terms of the -- what we
18 were asked to do with the -- with the
19 post-audit.

20 Q. Did you perform as close of a
21 reading on the Hadnot Point/Holcomb
22 Boulevard chapters as you did with Tarawa
23 Terrace Chapters A, C, and F?

24 A. I wouldn't say it was as
25 equally careful because it was less relevant,

1 but I did, as I recall, read the entire
2 report on the Hadnot Point/Holcomb Boulevard
3 report --

4 Q. Did you --

5 A. -- just to be familiar with the
6 overall project.

7 Q. And you said that you read
8 those. Did you skim through them or did you
9 read them carefully?

10 A. I read them completely.

11 Q. Is there a reason that you
12 skimmed through the Tarawa Terrace reports
13 but not the Hadnot Point reports?

14 MS. BAUGHMAN: Objection to
15 form.

16 THE WITNESS: I read through
17 the portions of the -- carefully the
18 Tarawa Terrace reports that I felt
19 were most critical for the work we
20 were asked to do.

21 Q. BY MR. ANTONUCCI: What about
22 the Hadnot Point reports was critical for
23 your Tarawa Terrace post-audit?

24 A. I -- I wouldn't classify it as
25 critical. I partially read that out of

1 interest. Curious to -- to kind of see and
2 compare the work that was done there versus
3 the work that was done at Tarawa Terrace.

4 Q. Do you have any opinions on the
5 Hadnot Point or Holcomb Boulevard chapters
6 that ATSDR published?

7 MS. BAUGHMAN: Objection.

8 Form.

9 THE WITNESS: A general opinion
10 that the work that was done there
11 seemed to be rigorous and followed
12 what I would consider good -- good
13 practices, sound practices.

14 Q. BY MR. ANTONUCCI: And -- I'm
15 sorry, go ahead.

16 A. I can't think of anything more
17 specific than that, I would say.

18 Q. What is that opinion based on?

19 A. Just my reading the document
20 and my experience and the processes they
21 appeared to follow.

22 Q. Do you have any other opinions
23 about ATSDR's Hadnot Point/Holcomb Boulevard
24 modeling efforts other than that they were
25 rigorous and followed good practices?

1 A. Not that I can think of at the
2 moment.

3 Q. So you provided a post-audit
4 for the Tarawa Terrace models; is that right?

5 A. Correct.

6 Q. You did not provide a
7 post-audit for the Hadnot Point/Holcomb
8 Boulevard model; is that right?

9 A. That's correct.

10 Q. Why did you not provide a
11 post-audit for Hadnot Point or Holcomb
12 Boulevard?

13 A. We were not asked to do so.

14 Q. Okay. Have -- are you familiar
15 with the text Modeling Groundwater Flow and
16 Contaminant Transport by Jacob Bear and
17 Alexander H.-D. Cheng?

18 A. I've heard of it.

19 Q. Have you ever reviewed it?

20 A. Not carefully, no.

21 Q. Do you have any opinion on the
22 reputation of Dr. Bear or Dr. Cheng?

23 A. I know Dr. Bear is a
24 well-known, widely respected groundwater
25 expert. I'm not as familiar with the other

1 author.

2 Q. Do you consider Modeling
3 Groundwater Flow and Contaminant Transport to
4 be a reliable authority in the field of
5 groundwater modeling?

6 MS. BAUGHMAN: Objection.
7 Form.

8 THE WITNESS: What do you mean
9 by "authority"?

10 Q. BY MR. ANTONUCCI: How would
11 you define "authority"?

12 MS. BAUGHMAN: Objection.
13 Form. He's asked you to clarify your
14 question.

15 THE WITNESS: I would just say
16 it's a -- it's a book in the field of
17 groundwater I'm familiar with, written
18 by a well-known groundwater expert.

19 Q. BY MR. ANTONUCCI: Do you
20 consider it to be a reliable book?

21 MS. BAUGHMAN: Objection.
22 Form.

23 THE WITNESS: I -- like I say,
24 I -- I don't -- I haven't read it. I
25 may have skimmed it earlier in my

1 career, so I -- I don't -- I'm not
2 comfortable rendering an opinion on
3 the book.

4 Q. BY MR. ANTONUCCI: Okay. Are
5 you familiar with the text Applied
6 Groundwater Modeling Simulation of Flow and
7 Advective Transport by Mary Anderson, William
8 Woessner and Randall Hunt?

9 A. Yes.

10 Q. My understanding is that there
11 are two editions of that text; is that right?

12 A. That's correct.

13 Q. 1992 and 2015?

14 A. Correct.

15 Q. Have you reviewed both editions
16 of that text?

17 A. Yes.

18 Q. Did you consult that text in
19 rendering the opinions in your reports?

20 A. Only in the basis that those
21 texts, along with hundreds if not thousands
22 of other documents, have formed my general
23 background and expertise in groundwater
24 modeling. Not -- not specifically to the
25 point where I would feel it needs to be

1 cited, that I can recall.

2 Q. Sure. So you consider the
3 Anderson, Woessner, and Hunt text to be a
4 reliable authority in the field of
5 groundwater modeling?

6 MS. BAUGHMAN: Objection.
7 Form.

8 THE WITNESS: I believe it's
9 a -- a -- a valuable and informative
10 book in the area of groundwater
11 modeling.

12 Q. BY MR. ANTONUCCI: What do you
13 mean by "valuable and informative"?

14 A. Meaning it has useful content
15 that is helpful in forming understanding of
16 groundwater modeling principles.

17 Q. Okay. In your experience as a
18 professor, have you ever used that text?

19 A. I teach a graduate course on
20 groundwater modeling, and I believe there
21 were times in the past where I listed
22 Anderson, Woessner as a -- as an optional
23 textbook that -- but I haven't used it as a
24 required textbook ever.

25 Q. Okay.

1 A. That I recall.

2 Q. Would you make an optional
3 text -- would you list an optional text on
4 your syllabus if it -- you considered it
5 unreliable?

6 MS. BAUGHMAN: Objection.
7 Form.

8 THE WITNESS: I'm not sure what
9 you mean by "unreliable." I think
10 it's a valuable and instructive book
11 on the general concepts of groundwater
12 modeling.

13 Q. BY MR. ANTONUCCI: Okay. Other
14 than listing it on your syllabus as an
15 optional text for your students, have you
16 used it in any other capacity as a professor?

17 A. One of the things that --
18 there's a -- early in the book there's, I
19 believe, a chapter on the groundwater
20 modeling process, talks about forming
21 conceptual models or the different steps in a
22 modeling project, and if I ever refer to that
23 text I often reference that as a -- as a good
24 overview of the groundwater modeling process
25 in general.

1 When I -- when I teach my
2 course, I present it in a similar fashion.

3 Q. Okay. And that's because it's
4 valuable, informative, and instructive;
5 right?

6 MS. BAUGHMAN: Objection.
7 Form.

8 THE WITNESS: It's -- it's an
9 instructive textbook, yes.

10 Q. BY MR. ANTONUCCI: Is it
11 valuable?

12 MS. BAUGHMAN: Objection.
13 Form.

14 THE WITNESS: I'd consider it
15 valuable, yeah.

16 Q. BY MR. ANTONUCCI: Is it
17 instructive?

18 A. It's instructive.

19 MR. ANTONUCCI: All right. I
20 am going to mark for identification
21 Exhibit 8.

22 (Exhibit 8 was marked for identification.)

23 Q. BY MR. ANTONUCCI: All right,
24 Dr. Jones, do you recognize this?

25 A. Yes, I do.

1 Q. What is it?

2 A. These are lecture notes used in
3 my graduate course on a Groundwater Modeling
4 CE 547.

5 Q. Okay. Did you create -- it
6 looks like this is a PowerPoint presentation;
7 is that right?

8 A. Correct.

9 Q. Did you create this yourself?

10 A. I did.

11 Q. Okay. And is this a fair and
12 accurate copy of your lecture notes from your
13 graduate course in groundwater modeling?

14 A. It appears to be, yes.

15 Q. Okay. I'd like for you to turn
16 to Page 2 and Slide 3.

17 A. Yes.

18 Q. I think this might be what you
19 were referencing earlier with regard to the
20 model development protocol from Anderson and
21 Woessner; is that correct?

22 A. Woessner.

23 Q. Excuse me. Thank you.

24 A. Yeah.

25 Q. So --

1 A. Excuse me. Yes, this is
2 precisely what I was discussing earlier.

3 Q. Okay. So you use the Anderson
4 and Woessner text to discuss the model
5 development protocol; is that right?

6 A. Yes.

7 Q. Okay. Did you adapt this flow
8 chart from the Anderson and Woessner --
9 Woessner text?

10 A. Yes.

11 Q. Okay. And then sort of
12 flipping through the other sections of this
13 PowerPoint, it looks like you continue to use
14 it throughout the lecture; is that right?

15 A. Well, the purpose of this
16 lecture is to provide an overview of the
17 model development protocol, and so the
18 different slides here are explaining each of
19 the different steps involved in the model
20 development process, and thus it relates to
21 the different items on that -- on that flow
22 diagram.

23 Q. Is that a yes?

24 A. Yes.

25 Q. Okay. Are you familiar with

1 the text Guidelines for Evaluating
2 Groundwater Flow Models by Thomas Reilly and
3 Arlen Harbaugh?

4 A. I'm aware of that, yes.

5 Q. Do you consider that text to be
6 a reliable authority in the field of
7 groundwater modeling?

8 A. Again, I -- I --

9 MS. BAUGHMAN: Object to the
10 form.

11 THE WITNESS: I think it's a
12 helpful book.

13 Q. BY MR. ANTONUCCI: Okay. How
14 about the text Calibration and Uncertainty
15 Analysis For Complex Environmental Models by
16 John Doherty; are you familiar with that?

17 A. Yes.

18 Q. And John Doherty is the
19 individual who developed the PEST code; is
20 that right?

21 A. That's correct.

22 Q. Do you consider Calibration
23 Uncertainty Analysis For Complex
24 Environmental Models to be a reliable
25 authority in groundwater modeling?

1 MS. BAUGHMAN: Object to the
2 form.

3 THE WITNESS: I think it's a --
4 it's a good reference for calibration.

5 Q. BY MR. ANTONUCCI: Okay. And
6 earlier you -- you mentioned working with
7 Dr. Prabhaker Clement on a grant or some --
8 the project at the University of Alabama; is
9 that right?

10 A. That's correct.

11 Q. Dr. Clement is the principal
12 investigator of that project?

13 A. That's correct.

14 Q. What's your opinion of
15 Dr. Clement?

16 A. Dr. Clement and I have worked
17 together professionally since the earliest
18 days of my career. I consider him a very
19 good researcher and also a close personal
20 friend. And he and I are also currently
21 co-investigators on a NOAA-funded research
22 grant.

23 Q. All right. I'm going to sort
24 of refocus attention on the ATSDR reports
25 which you were asked to provide opinions

1 about.

2 That's correct, that you were
3 asked to provide opinions on ATSDR's Tarawa
4 Terrace reports; right?

5 MS. BAUGHMAN: Object to the
6 form.

7 THE WITNESS: I'm not sure I
8 would phrase it that way. We were
9 asked to conduct a post-audit and
10 render opinions relative to that
11 post-audit, and -- and that
12 involved -- I'm going to take that
13 back.

14 Yes, we did render opinions on
15 these reports.

16 Q. BY MR. ANTONUCCI: Okay. These
17 reports deal with, at a very basic level,
18 groundwater models; right?

19 A. What do you mean by "a very
20 basic level"?

21 Q. I don't mean to say that the
22 reports themselves are basic. I guess I
23 should say, like, essentially they deal with
24 groundwater models; is that correct?

25 A. That's correct.

1 Q. Okay. Groundwater models are
2 simplified versions of reality; right?

3 A. That's correct.

4 Q. And we should never expect a
5 groundwater model to perfectly reproduce
6 subsurface conditions; is that correct?

7 MS. BAUGHMAN: Object to the
8 form.

9 THE WITNESS: That's correct.
10 I would not expect any model to
11 perfectly replicate the real-world
12 system that it is meant to simulate.

13 Q. BY MR. ANTONUCCI: Okay. If
14 you could please turn your attention back to
15 Exhibit 8. That's the PowerPoint.

16 A. Sure.

17 Q. I'd like you to turn to
18 Slide 14.

19 A. Yes.

20 Q. Okay. There are two quotes on
21 this slide; right?

22 A. Correct.

23 Q. The first one says "One of the
24 most insidious and nefarious properties of
25 scientific models is their tendency to take

1 over, and sometimes supplant, reality." That
2 quote is attributed to Erwin Chargaff?

3 A. That's correct.

4 Q. Did I read that correctly?

5 A. Uh-huh.

6 Q. And that was quoted in J.J.
7 Zuckerman, The Coming Renaissance of
8 Descriptive Chemistry, Journal of Chemical
9 Education in 1986?

10 THE REPORTER: In what year?

11 MR. ANTONUCCI: 1986.

12 Q. Is that correct?

13 A. Yes.

14 Q. The next quote on the page
15 says, quote, "... all models are
16 approximations. Essentially, all models are
17 wrong, but some are useful." And that quote
18 is attributed to George E.P. Box.

19 Did I read that correctly?

20 A. Correct.

21 Q. And that's from George E.P. Box
22 and Norman R. Draper, Empirical
23 Model-Building and Response Surfaces 2007; is
24 that right?

25 A. Correct.

1 Q. This is the last slide of your
2 lecture.

3 A. That's correct.

4 Q. Why did you choose to end your
5 lecture with these quotes?

6 A. Because it's a -- it's a fun
7 launching pad for a discussion in the class.
8 I read these quotes and I ask the students,
9 What do you think of these statements? If
10 models are wrong, why are you taking this
11 class?

12 And that leads to a --
13 typically to a very constructive discussion
14 of what's kind of captured in Box's quote
15 there that, yeah, you should never expect a
16 model to be a perfect replication of reality;
17 however, models are extremely valuable as
18 an -- as an interpretive tool, a historical
19 reconstruction tool, and in many cases
20 they're the best and only tool we have.

21 And so, again, it's meant to
22 stimulate a discussion where I then talk
23 about the benefits of modeling, I talk about
24 all the different cases in -- in groundwater
25 management and analysis where models are

1 critical.

2 Q. You agree that all models are
3 approximations?

4 A. Yes.

5 Q. You agree that all models are
6 wrong?

7 MS. BAUGHMAN: Object to the
8 form.

9 THE WITNESS: Wrong in the
10 sense that they're all simplifications
11 of reality. That's the context of his
12 statement here.

13 Q. BY MR. ANTONUCCI: So we can't
14 expect a model to be a perfect representation
15 of reality; right?

16 A. That's correct.

17 Q. You can put Exhibit 8 aside
18 now.

19 So I understand that you were
20 asked to provide a post-audit of ATSDR's
21 Tarawa Terrace groundwater flow and transport
22 model; is that correct?

23 A. Correct.

24 Q. Were you asked to do any other
25 evaluation of ATSDR's Tarawa Terrace flow and

1 transport model?

2 MS. BAUGHMAN: Object to the
3 form.

4 THE WITNESS: What do you mean
5 by "evaluation"?

6 Q. BY MR. ANTONUCCI: Did you do
7 anything -- strike that.

8 Were you asked to do anything
9 other than the post-audit?

10 MS. BAUGHMAN: Object to the
11 form.

12 THE WITNESS: Jeff and I were
13 asked to perform some additional
14 simulations using the models to --
15 with respect to how the model output
16 varies as a function of retardation
17 factor.

18 The -- the beginning simulation
19 time or the -- excuse me -- the --
20 when the contaminants were released.
21 And both of those, the results of that
22 were included in Morris Maslia's
23 rebuttal report.

24 In other words, we were asked
25 to run the models and post process the

1 results and generate some of the
2 graphics that Morris then relied on in
3 his report, and then we were -- most
4 recently we -- we did an analysis
5 where we varied the reaction rate and
6 determined how sensitive the model was
7 to the reaction rate.

8 Q. BY MR. ANTONUCCI: Is reaction
9 rate a synonym for biodegradation rate?

10 A. It includes the biodegradation
11 rate, yeah.

12 Q. Are there other -- so is it
13 correct that reaction rate and biodegradation
14 rate are not the same thing?

15 A. In general, the -- the reaction
16 rate can include any kind of decay of the
17 contaminant. Most commonly that's a result
18 of biodegradation.

19 But, you know, in the grand
20 scope of transport modeling, for example, if
21 you're simulating a radioactive contaminant
22 then it would simulate the half-life and
23 decay of the contaminant.

24 Q. So you performed a sensitivity
25 analysis varying the --

1 A. The reaction --

2 Q. -- reaction rate; is that
3 right?

4 A. Correct.

5 Q. You did not vary the
6 biodegradation rate?

7 A. Well, the reaction rate is
8 inclusive of the biodegradation rate in this
9 case.

10 Q. Does it include anything else?

11 A. I -- I believe that's
12 predominantly what it's meant to represent in
13 this case.

14 Q. Okay. And when were you asked
15 to perform that sensitivity analysis?

16 A. Couple of weeks ago, maybe.

17 Q. Was it more than a month ago?

18 A. No.

19 Q. Was that after you had
20 disclosed your rebuttal report?

21 A. Yes.

22 Q. Other than the figures that you
23 created for Mr. Maslia's rebuttal report and
24 the sensitivity analysis that we've already
25 discussed, were you asked to do any other

1 evaluation of ATSDR's Tarawa Terrace
2 groundwater flow and transport model?

3 A. No.

4 Q. Did you review the data mining
5 techniques that ATSDR employed to generate
6 their groundwater flow and transport model?

7 MS. BAUGHMAN: Object to the
8 form.

9 THE WITNESS: I recall reading
10 about what Morris referred -- or what
11 was referred to as the data mining
12 process, but I'm not sure I could
13 recall specific details.

14 Q. BY MR. ANTONUCCI: So is it
15 fair to say you didn't thoroughly evaluate
16 the data mining process that ATSDR undertook?

17 MS. BAUGHMAN: Object to the
18 form.

19 THE WITNESS: I -- I reviewed
20 what was in, I believe, Chapter A --
21 A, C, and F.

22 Q. BY MR. ANTONUCCI: Okay. Did
23 you review the conceptual model for the
24 Tarawa Terrace groundwater flow and transport
25 model that ATSDR created?

1 A. Yes.

2 Q. Can you describe that review,
3 please.

4 A. Well, the -- the conceptual
5 model was described in the Chapters A, C, and
6 F, and I reviewed it as I -- in that context.

7 Q. Did you undertake any other
8 review of the conceptual model, apart from
9 your review of the reports?

10 A. No.

11 Q. Did you note any flaws in the
12 conceptual model?

13 A. I don't recall anything that
14 stood out to me as being flawed or a bad
15 assumption, no.

16 Q. Okay. If you had noted any
17 flaws, would you have included that in your
18 report?

19 A. Depending on the magnitude of
20 the flaw, I suppose, yes.

21 Q. How big would a flaw have to be
22 to be included in your report?

23 A. Well, one of the opinions in
24 our report was the -- the methods that they
25 followed were sound and followed good

1 scientific and engineering practices and,
2 yeah, I just -- I did not find anything
3 that -- that I was -- would consider to be an
4 error in their process.

5 Q. If you had noted a flaw in
6 ATSDR's conceptual model, do you believe that
7 recalibration of the models using the
8 post-audit data would have yielded
9 substantive changes in ATSDR's original
10 results?

11 MS. BAUGHMAN: Object to the
12 form. Incomplete hypothetical.

13 THE WITNESS: Can you say that
14 again.

15 Q. BY MR. ANTONUCCI: Sure.
16 Suppose you had noted a flaw in
17 ATSDR's conceptual model. Do you believe
18 that recalibration of the ATSDR models using
19 your post-audit data would have yielded
20 substantive changes in ATSDR's original
21 results and conclusions?

22 MS. BAUGHMAN: Object to the
23 form.

24 THE WITNESS: I think their
25 conceptual model was -- was sound and

1 consistent with the hydrogeologic
2 conditions at Tarawa Terrace, and I
3 think the model was well calibrated.

4 Q. BY MR. ANTONUCCI: Do you have
5 any opinion about whether or not a --
6 Mr. Maslia or Dr. Aral should have reran the
7 model using your post-audit data?

8 A. Yes.

9 Q. What is that opinion?

10 A. So the -- the objective of the
11 post-audit was to take the original MODFLOW
12 and MT3D models and evaluate the performance
13 of the model with additional data which was
14 not available to them at the time they built
15 the model.

16 And when they built the model,
17 they had two sets of data. They had PCE --
18 well, they had a large set of head and flow
19 data that they used to build a
20 well-calibrated flow model, which is the
21 foundation of the transport model.

22 To calibrate the transport
23 model, they had a set of PCE concentrations,
24 I believe there were 36 at -- at different
25 points in time at monitoring well locations.

1 And then they had some concentrations of
2 water at the water -- Tarawa Terrace water
3 treatment plant.

4 The objective, as I understand
5 it, the original study was to do historical
6 reconstruction of the concentration of the
7 water at the water treatment plant based on
8 the -- the migration of the plume through the
9 Tarawa Terrace aquifer.

10 And when they did their
11 calibration, the -- if you look specifically
12 at the PCE -- measured PCE -- observed PCE
13 concentrations at the observation wells,
14 there was a high bias for observed
15 concentrations in the lower range, but where
16 there was high, observed concentrations, the
17 simulated concentrations matched quite
18 closely.

19 That's significant because that
20 means that in the center of the plume where
21 the concentrations are the greatest, the
22 model did a good job predicting the
23 concentrations.

24 Now, that happens to correspond
25 to Well TT-26, which as the model showed was

1 the primary contributor of contaminated water
2 to the Tarawa Terrace water treatment plant.

3 After they did their initial
4 calibration --

5 INTERCOM SYSTEM: Hi everyone.
6 Trina and her dog are in her office.
7 If you want to go over there and say
8 hi to -- to the dog and also to Trina
9 if you want, please head over there.
10 Thank you.

11 THE WITNESS: The -- they --
12 they -- the -- the model simulated
13 concentrations at the water treatment
14 plant matched the observed
15 concentrations at the water treatment
16 plant extremely well.

17 So when we did our post-audit
18 work, we had an additional 318
19 measured concentrations, observed
20 concentrations. A much richer set
21 that they didn't have in the original
22 case.

23 So -- but what we didn't have
24 is, you know, additional
25 concentrations at the water treatment

1 plant, of course, because they stopped
2 pumping due to the contamination.

3 So when we did our post-audit,
4 we found that the -- if you look at
5 the simulated versus observed
6 concentrations from the extended
7 simulation we constructed in the
8 post-audit, there's a significant
9 amount of variance in the observed
10 concentrations.

11 And that variance caused
12 some -- some high fluctuations in the
13 area -- in the error. However, the
14 errors seemed to be well balanced,
15 meaning the model did a good job at
16 simulating the primary trajectory of
17 the plume.

18 In fact, if you look at the
19 bias, the bias we got from the
20 extended simulation with the
21 additional data was -- was smaller
22 than the bias they had with the
23 initial concentrations at the
24 observation wells, which I believe
25 strengthens the evidence supporting

1 the accuracy of the additional model.

2 And, therefore, I -- there's no
3 reason for me to believe, based on the
4 results of the post-audit, that the
5 initial model was wrong, especially
6 when it comes to the concentrations at
7 the water treatment plant.

8 It did an excellent job and
9 there's nothing in the post-audit that
10 would warrant, I believe, that would
11 be strong evidence to say, hey,
12 there's something wrong with the
13 original model.

14 Q. BY MR. ANTONUCCI: Well, thank
15 you, Dr. Jones, I appreciate that. But my
16 question was whether they should have reran
17 the model using the newly available data?

18 MS. BAUGHMAN: Object to the
19 form. Asked and answered.

20 THE WITNESS: We did rerun the
21 model. That's part of the -- that's
22 what we did in the post-audit, is we
23 ran the model.

24 Are you asking me if they
25 should have recalibrated it or if they

1 should have rerun the model?

2 Q. BY MR. ANTONUCCI: Should they
3 have recalibrate the model using newly
4 available data?

5 A. We -- well, before you
6 recalibrate it, you would do an analysis
7 precisely in the fashion that we did. You
8 would test the original model using the new
9 data.

10 And if in that process there
11 was some evidence that there was a major flaw
12 with the original model or that you would get
13 significantly different answer, then that may
14 warrant a reevaluation. But we did not find
15 any evidence to that.

16 MR. ANTONUCCI: Okay. I'd like
17 to clarify for the record. In my
18 previous question I used the term
19 "they." I was referring to Morris
20 Maslia and Dr. Aral and their expert
21 reports.

22 All right. I would -- I would
23 like to discuss a new document, so I
24 am going to mark for identification
25 Exhibit 9.

1 (Exhibit 9 was marked for identification.)

2 Q. BY MR. ANTONUCCI: All right.
3 Dr. Jones, Exhibit 9 is the document titled
4 "Analyses of Groundwater Flow, Contaminant
5 Fate and Transport, and Distribution of
6 Drinking Water at Tarawa Terrace and
7 Vicinity, U.S. Marine Corps Base Camp
8 Lejeune, North Carolina: Historical
9 Reconstruction and Present-Day Conditions
10 Chapter A: Summary of Findings."

11 And for the record, this
12 document has the Bates range beginning
13 CLJA_WATERMODELING_09-0000615638 and ends
14 with the Bates number ending in 615753.

15 And when I say "Bates number,"
16 Dr. Jones, do you know what I'm referring to?

17 A. My understanding is it's a --
18 it's a systematic way of referring to content
19 that's been submitted in litigation.

20 Q. Right. It's the numbers at the
21 bottom; right?

22 A. Right.

23 Q. Okay. So I would appreciate if
24 you could turn to Page A48 of Exhibit 9, and
25 that page ends in Bates Number 615699.

1 Okay. So the caption
2 underneath the figure on Page A48 says
3 "Figure A21. Sensitivity of
4 tetrachloroethylene concentration in finished
5 water at the water treatment plant to
6 variation in water-supply well operations,
7 Tarawa Terrace, U.S. Marine Corps Base Camp
8 Lejeune, North Carolina. [PCE,
9 tetrachloroethylene; see text for discussion
10 of points A-I]."

11 You're familiar with this
12 figure; right, Dr. Jones?

13 A. Yeah, I've seen it before.

14 Q. This is one of the figures you
15 had tabbed in your copy of the report; right?

16 A. No, it was not.

17 Q. Okay. Well, this is a graph
18 from ATSDR's sensitivity analysis of the
19 Tarawa Terrace model; isn't that right?

20 A. Correct.

21 Q. And this shows the change in
22 PCE concentrations in finished water based on
23 different well pumping schedules; is that
24 right?

25 A. Correct.

1 Q. And, Dr. Jones, you're aware
2 that ATSDR used the pumping and schedule
3 optimization system tool to simulate
4 otherwise unknown supply well pumping rates;
5 right?

6 A. Yes.

7 Q. And in this graph, all of the
8 simulations assumed a constant mass loading
9 rate of 1,200 grams per day; is that right?

10 A. Yes, I assume so.

11 Q. And that constant rate of
12 1,200 grams per day is the same mass loading
13 rate that you used when conducting the
14 post-audit; right?

15 A. Correct, we did not change the
16 model.

17 Q. Okay. So looking at Figure A21
18 on Page A48 of Exhibit 9, we see that all of
19 these use a mass loading start date of
20 January 1953; is that correct?

21 A. Where are you reading that?

22 Q. Strike that.

23 All of the -- ATSDR's model
24 assumed a PCE mass loading start date of
25 January 1953; is that right?

1 A. As far as I know, yes.

2 Q. Okay. And that's the same mass
3 loading start date that you used in your
4 post-audit?

5 A. Correct.

6 Q. Okay. So on Figure A21, that
7 blue line that's -- it's labeled A.
8 Do you see that?

9 A. Yes.

10 Q. This blue line shows the
11 earliest arrival of PCE at the water
12 treatment plant under the maximum pumping
13 schedule; right?

14 A. Correct.

15 Q. Okay. And so that blue line
16 shows a concentration of 0.001 micrograms per
17 liter of PCE starting just before
18 January 1955; is that right?

19 A. That looks correct, yes.

20 Q. Okay. Now, there's also a red
21 line here, and that one is labeled B.
22 Do you see that?

23 A. Yes.

24 Q. And that is the calibrated
25 model; right?

1 A. Correct.

2 Q. Okay. That's the same -- that
3 model used the same parameters that you used
4 in your post-audit; is that right?

5 A. Yes.

6 Q. So that red line, the
7 calibrated model, shows a concentration of
8 0.001 micrograms per liter of PCE starting on
9 or about January 1955; right?

10 A. Correct.

11 Q. Okay. Next I'd ask that you
12 look at the black line. That one is labeled
13 C.

14 A. Yes.

15 Q. So this shows the late arrival
16 of PCE at the water treatment plant under the
17 Minimum Schedule Number 2; is that right?

18 A. That looks correct.

19 Q. Okay. And under the Minimum
20 Schedule 2, TT-26 is operated at at least
21 25 percent capacity; right?

22 A. Yes.

23 Q. And that black line that's
24 line -- letter C shows a concentration of
25 0.001 micrograms per liter of PCE starting

1 sometime after January 1955; right?

2 A. Yes.

3 Q. All right. Now, finally
4 there's the green line, and that one is, I
5 believe, split into D and G.

6 Do you see what I'm referring
7 to?

8 A. Yes -- well, let's see. The
9 black -- oh, yes, the -- Well TT-26 not
10 operated January '62 to February 1976, hence
11 there's a gap, yes.

12 Q. Okay. So that green line, that
13 shows the arrival -- excuse me -- it shows
14 the latest arrival of PCE at the water
15 treatment plant under Minimum Schedule 1;
16 right?

17 A. That's -- that looks correct,
18 yeah.

19 Q. Okay. And minimum -- Minimum
20 Schedule 1 is where Well TT-26 is not
21 operated between January of 1962 and February
22 of 1976?

23 A. That's correct.

24 Q. Okay. So that green line shows
25 a concentration above 0.001 micrograms per

1 liter of PCE starting sometime between
2 January 1955 and January of 1960; right?

3 A. Starting, yes.

4 Q. Okay. And then there's sort of
5 a gap where the green line is not represented
6 on the figure, and then it restarts again
7 sometime between January 1970 and
8 January 1975; is that right?

9 A. Yes.

10 Q. Okay. So in general, that blue
11 line, that shows the highest PCE
12 concentrations over time; right?

13 A. Yes.

14 Q. Then that red line there, that
15 shows the next highest PCE concentrations
16 over time; right?

17 A. Yes.

18 Q. Then the black line shows the
19 next highest PCE concentrations over time?

20 A. Yeah, I think that's fair.

21 Q. Okay. And, finally, that green
22 line shows the lowest PCE concentrations over
23 time; right?

24 A. Correct.

25 Q. Okay. So the arrival of PCE at

1 the water treatment plant is dependent on
2 when PCE contamination arrived at the supply
3 wells; right?

4 A. Can you say that again.

5 Q. Of course.

6 The arrival of PCE at the water
7 treatment plant is dependent on when PCE
8 contamination arrived at the supply wells;
9 right?

10 A. Correct.

11 Q. The concentration of PCE
12 simulated by the model is dependent on when
13 PCE contamination arrived at the supply
14 wells; right?

15 A. The concentration at the
16 treatment plant. You said -- I'm sorry, can
17 you state that one more time.

18 Q. Of course.

19 The concentration of PCE
20 simulated by the model is dependent on when
21 PCE contamination arrived at the supply
22 wells; right?

23 MS. BAUGHMAN: Object to the
24 form.

25 THE WITNESS: Yeah, I -- I

1 think you're not clear in how you
2 formulated that question. Do you mean
3 the concentration at the water
4 treatment plant?

5 Q. BY MR. ANTONUCCI: As opposed
6 to?

7 A. You just said "the
8 concentration."

9 Q. Sure. Yes. Let's say -- I'll
10 rephrase the question.

11 A. Okay.

12 Q. The concentration of PCE
13 simulated by the model at the water treatment
14 plant is dependent on when PCE contamination
15 arrived at the supply wells; right?

16 A. Correct.

17 Q. Okay. And to be clear, the
18 contamination at the water treatment plant
19 was assumed to be the same level at the tap
20 in consumer's homes; right?

21 A. Would you state that again.

22 Q. Sure.

23 The ATSDR assumed that
24 contaminations of PCE at the water treatment
25 plant were the same as those after the water

1 had gone through the water distribution
2 system and was at the point of use by the
3 consumer; is that right?

4 A. Yeah, I'm not sure on that.

5 Q. Do you know if -- I mean,
6 should there be a different contamination
7 concentration at the water treatment plant
8 versus at the tap?

9 A. I know that one of the areas
10 that's been debated in the -- in the
11 rebuttals and the expert report is how much
12 the concentration changes through the water
13 treatment process, and I know that was
14 reviewed by the expert panel and others.

15 I'm generally familiar with
16 that discussion that that volatilization
17 issue was addressed by Sabatini. That is not
18 my area of expertise.

19 I will say that what the model
20 simulates is the water that would be pumped,
21 the concentration of the water as it's pumped
22 out of the aquifer, that's what -- the model
23 does not inherently explicitly include the
24 treatment process as part of the model.

25 Q. Okay.

1 A. It's simply how the
2 contaminants move through the aquifer through
3 the wells.

4 Q. Do you agree that there would
5 be losses of contamination to volatilization
6 during the treatment process?

7 MS. BAUGHMAN: Object to the
8 form.

9 THE WITNESS: That is not my
10 area of expertise.

11 Q. BY MR. ANTONUCCI: Okay.
12 However, the model -- the model doesn't take
13 that into account --

14 MS. BAUGHMAN: Object to the
15 form.

16 Q. BY MR. ANTONUCCI: -- correct?

17 A. The model does not explicitly
18 simulate volatilization.

19 Q. Does the model implicitly
20 simulate volatilization?

21 A. It potentially could.

22 Q. Can you please elaborate.

23 A. Sure. Suppose that the
24 concentrations used to calibrate the model
25 were concentrations taken from treated water.

1 If the model is then calibrated to predict
2 accurate concentrations at the water
3 treatment plant based on observed
4 concentrations of treated water, then you
5 could argue that it implicitly includes the
6 effects of any volatilization.

7 Q. Did the model calibrate to
8 treated water samples?

9 A. I know some of the samples --
10 from what I've read, it's believed some of
11 the samples may have been post-treated water,
12 and -- but I don't know if there's any
13 conclusion on the majority of the samples.

14 Q. Okay. Well, it's fair to say
15 that concentrations of PCE at the water
16 treatment plant that's simulated by the model
17 is dependent on when PCE contamination began
18 entering the aquifer; right?

19 A. Yeah.

20 Q. Based on your review of the
21 reports, is it your understanding that ATSDR
22 assumed PCE contaminants started leaking when
23 ABC Cleaner started operating in 1953?

24 A. Yes.

25 Q. Hypothetically, if ABC Cleaners

1 opened later than 1953, would that impact the
2 arrival time of contaminants at the water
3 treatment well?

4 A. It would --

5 MS. BAUGHMAN: Object to the
6 form. Incomplete hypothetical.

7 Go ahead.

8 THE WITNESS: It makes a small
9 difference in the concentrations at
10 the water treatment plant.

11 Q. BY MR. ANTONUCCI: Okay. So
12 let's say that the --

13 MS. BAUGHMAN: Were you
14 finished answering?

15 THE WITNESS: Let me clarify.

16 I know some different dates
17 have been proposed, argued by the DOJ
18 experts as a more accurate start date.

19 Having run the model at both
20 start dates, I -- I believe that the
21 differing start dates as proposed by
22 the DOJ experts does not make a
23 substantial difference in the
24 concentrations that are simulated at
25 the water treatment plant.

1 Q. BY MR. ANTONUCCI: Okay. So it
2 doesn't make a substantial difference; right?

3 A. No, that was part of Morris
4 Maslia's rebuttal report.

5 Q. Is that a yes?

6 A. Yes.

7 Q. Okay. Does it make any
8 difference?

9 A. It makes some difference.

10 Q. Okay. Hypothetically, let's
11 ignore the start dates proposed by differing
12 experts.

13 A. Okay.

14 Q. Let's say that the
15 contamination began in 1970. How big of a
16 difference would that make?

17 MS. BAUGHMAN: Object to the
18 form.

19 THE WITNESS: If the
20 contamination started in 1970 --

21 Q. BY MR. ANTONUCCI: Let's say --
22 what would the impact on 1981 data be?

23 MS. BAUGHMAN: Object to the
24 form. Are you asking in terms --
25 wait, in 1981?

1 Are you asking in terms of the
2 concentration or the arrival time? I
3 object to the form. I don't
4 understand the question.

5 THE WITNESS: So if --

6 MS. BAUGHMAN: It's also
7 outside the scope.

8 THE WITNESS: If the
9 contamination was not released until
10 1970, and that was simulated in the
11 model, yeah, I would suspect that
12 would lead to a much more significant
13 difference in the results.

14 Q. BY MR. ANTONUCCI: Okay. If
15 you were to -- to dispose of dry cleaning
16 solvents improperly -- which I know you never
17 would -- they would be -- you would -- let's
18 assume you would dump them on the ground.

19 Do you understand where my
20 hypothetical is so far?

21 A. Okay, yeah, sure.

22 Q. If you were to just pour dry
23 cleaning solvents on the ground outside,
24 would the PCE from that solvent enter the
25 aquifer immediately?

1 MS. BAUGHMAN: Object to the
2 form. Incomplete hypothetical.
3 Foundation.

4 THE WITNESS: Immediately, no.

5 Q. BY MR. ANTONUCCI: Okay. Can
6 you elaborate?

7 A. Well, if you -- for example, if
8 you had a really high water table, the water
9 table's close to the surface, it would enter
10 it very rapidly. Or if you had highly
11 permeable materials between the ground
12 surface and the aquifer, that contamination,
13 again, could happen very rapidly, so it's --
14 depends on the context.

15 Q. Sure. I guess is the inverse
16 true? If you had a low water table or low
17 permeability materials?

18 MS. BAUGHMAN: Object to the
19 form.

20 THE WITNESS: There are
21 conditions where it would take longer
22 to get to the groundwater, yes, if
23 it's starting at the ground surface.

24 Q. BY MR. ANTONUCCI: Okay. So
25 from the ground surface to the aquifer it has

1 to travel through something; right?

2 A. Yeah.

3 Q. And that takes time, depending
4 on different conditions; right?

5 A. Yeah, another factor is the
6 precipitation. How -- and snow melt,
7 precipitation, how much water is -- is
8 traveling through -- we call that the vadose
9 zone between the ground surface and the water
10 table.

11 And, you know, there are
12 conditions that are a variety of conditions
13 that would impact the -- the -- the rate of
14 transport from the ground surface to the
15 aquifer.

16 Q. Okay. Does MT3DMS model
17 contaminant transport through the vadose
18 zone?

19 A. No.

20 Q. Does TechFlowMP?

21 A. I believe it does, yes.

22 Q. And then for my own
23 understanding, the vadose zone and the
24 unsaturated zone, are those the same concept?

25 A. Yeah, same thing.

1 Q. If -- if the DOJ experts are
2 correct, would you agree that it makes a
3 substantial difference for calculating
4 exposure to someone at Tarawa Terrace prior
5 to DOJ's start but after ATSDR's mass loading
6 start?

7 MS. BAUGHMAN: Object to the
8 form.

9 THE WITNESS: I don't
10 understand the question.

11 Q. BY MR. ANTONUCCI: Not sure I
12 do either.

13 So say the true start date of
14 contaminant mass loading at Tarawa Terrace is
15 sometime between when ATSDR said it started
16 and when DOJ said it started.

17 You on board?

18 A. So January '53 is when ATSDR
19 said it started. To my understanding the DOJ
20 said maybe June '54 or July '54? Does that
21 sound right?

22 Q. Sounds about right.

23 A. Okay.

24 Q. Sometime in between there.

25 A. Okay.

1 Q. If that was when mass loading
2 started, would it make a substantial
3 difference for calculating exposure for
4 someone who was at Tarawa Terrace?

5 MS. BAUGHMAN: Object to the
6 form.

7 THE WITNESS: Your question is
8 not -- you said "if that is when." We
9 just talked about two different dates
10 or -- can you restate the question?

11 Q. BY MR. ANTONUCCI: Sure.

12 Let's say contaminant mass
13 loading started in December 1953. Would --

14 A. One year later, roughly, yeah.

15 Q. Would that make a substantial
16 difference for calculating exposure to
17 someone at Tarawa Terrace?

18 MS. BAUGHMAN: Object to the
19 form.

20 THE WITNESS: No, I think one
21 of the dates that we simulated may
22 have been January 1954, which is one
23 month off from that, and kind of
24 between the January '53 and July '54
25 dates and, no, none of those changes

1 in the date made a substantial
2 difference in the concentration of the
3 water at Well TT-26 or in the
4 concentration of the water at the
5 Tarawa Terrace water treatment plant
6 over the majority of the time frame.

7 Q. BY MR. ANTONUCCI: Okay. How
8 far apart were the simulated concentrations
9 from this experiment that you did for
10 Mr. Maslia's report?

11 MS. BAUGHMAN: Object to the
12 form.

13 THE WITNESS: Well, if -- if
14 you have the copy of the Maslia
15 rebuttal I could -- we could look at
16 the graph.

17 MR. ANTONUCCI: Okay.

18 THE WITNESS: It -- in my
19 opinion, there -- there was a minor
20 difference through a majority of the
21 simulation period.

22 Q. BY MR. ANTONUCCI: Were there
23 major differences at any time in the
24 simulation period?

25 MS. BAUGHMAN: Object to the

1 form.

2 THE WITNESS: Not that I would
3 consider significant. There was -- if
4 you -- during the very early years,
5 there was maybe a larger gap between
6 the curves, but that is where the
7 concentrations are really low.

8 And once the -- you get a few
9 years later where the concentrations
10 are higher, those curves -- the
11 distance between those curves narrowed
12 significantly and through most of the
13 period from, you know, '60s, '70s,
14 through the '80s, there's very little
15 difference.

16 Q. BY MR. ANTONUCCI: Do you
17 recall the magnitude of the difference at any
18 time?

19 MS. BAUGHMAN: Object to the
20 form.

21 THE WITNESS: Numerical
22 magnitude, no.

23 Q. BY MR. ANTONUCCI: What
24 numerical magnitude would you consider
25 significant?

1 MS. BAUGHMAN: Object to the
2 form.

3 THE WITNESS: That depends on
4 the context.

5 Q. BY MR. ANTONUCCI: What -- what
6 numerical difference would you consider
7 minor?

8 A. Depends on the context.

9 Q. What would impact your
10 consideration there?

11 A. Well, for example, in this case
12 for the majority of the range the -- the
13 concentrations are at a very high rate well
14 over the MCL level of five.

15 And qualitatively looking at
16 that, it seemed like the model was highly
17 insensitive or relatively insensitive to
18 the -- to the start date given the start
19 dates that were considered.

20 Q. Okay. And earlier you
21 mentioned that the model is perhaps better at
22 calculating concentrations at TT-26 than over
23 the wider area. Am I -- is that correct?

24 MS. BAUGHMAN: Object to the
25 form.

1 THE WITNESS: That's not how I
2 would characterize what I said.

3 Q. BY MR. ANTONUCCI: Can you
4 please repeat it for me.

5 A. Sure.

6 MS. BAUGHMAN: Object to the
7 form.

8 What's the question? I
9 don't -- let's make sure there's a
10 question.

11 THE WITNESS: Do you want me to
12 restate what I said earlier relative
13 to simulated concentrations at
14 observation wells versus -- sure.

15 As I mentioned earlier, I
16 believe the concentration data used to
17 calibrate and evaluate the performance
18 of the original flow and transport
19 model consisted of two types of data.

20 One of which was PCE
21 concentrations that were sampled at
22 observation wells; and the other is
23 a -- was a series of measured
24 concentrations at the water treatment
25 plant.

1 When you have an individual
2 sample taken at an observation well,
3 it's a small amount of water from a
4 very small part of the aquifer, a
5 specific point location, and -- and it
6 has -- it's more susceptible to
7 sampling errors and -- and the impact
8 of local scale heterogeneities.

9 And when they -- when they
10 calibrated to that, they had a good
11 match where the simulated observed
12 concentrations were high, and a bias
13 where the observed concentrations were
14 low.

15 The concentrations that were
16 measured -- or that were observed at
17 the water treatment plant are
18 different because that involves the
19 collection of water from a variety of
20 wells over a period of time, and the
21 water pumped through those wells comes
22 from a -- a much broader part of the
23 aquifer than when you take a simple
24 sample.

25 And those -- the contaminant is

1 then brought in and it's mixed and
2 averaged. And so it has much less
3 variation and sampling error than
4 you'd get with the individual error.

5 So I would consider that to be,
6 I would say, the gold standard of --
7 of data for calibrating the original
8 model. And it matched, in my opinion,
9 the model-simulated results matched
10 those observed concentrations at the
11 water treatment plant quite well.

12 Q. BY MR. ANTONUCCI: Okay.

13 Before this deposition began, when speaking
14 to counsel, you used the phrase "dilution is
15 the solution to pollution"; right?

16 A. Yeah.

17 Q. That's kind of what we're
18 talking about here, isn't it?

19 MS. BAUGHMAN: Object to the
20 form.

21 Q. BY MR. ANTONUCCI: There were
22 multiple wells, some were presumably pumping
23 clean water, some were presumably pumping
24 contaminated water, mixing and diluting at
25 the water treatment plant; right?

1 MS. BAUGHMAN: Object to the
2 form.

3 THE WITNESS: Yeah -- well, the
4 context are a little different. We
5 were talking about dirty air being
6 blown out of the valley.

7 But when you calculate the --
8 the concentration of water at the
9 water treatment plant, you have to
10 consider the -- the pumping rate for
11 each of the supply wells to the water
12 treatment plant, and then the
13 concentration of the water coming in.

14 So there's a mixing process
15 that's represented in the equation we
16 use to come up with those
17 concentrations.

18 It weights the -- the overall
19 concentration by the product of the
20 individual concentrations and the
21 individual pumping rates.

22 So there's a mixing and, yeah,
23 there's a dilution process. For
24 example, the -- the water coming in in
25 Well TT-26 has a higher concentration

1 than the water you measure at the
2 water treatment plant because it's
3 mixed with water from other supply
4 wells that have generally a lower
5 concentration.

6 Q. BY MR. ANTONUCCI: Okay. So --
7 all right. Thank you for answering that.

8 If you could turn to Page A2 of
9 Exhibit 9. I think this will maybe tie up
10 what we were discussing earlier. And that is
11 the page ending in Bates Number 615653.

12 So the footnote on this page,
13 Footnote 6 says "For this study, finished
14 drinking water is defined as groundwater that
15 has undergone treatment at a water treatment
16 plant and is delivered to a person's home.
17 The concentration of contaminants in treated
18 water at the water treatment plant is
19 considered the same as the concentrations in
20 the water delivered to a person's home. This
21 assumption is tested and verified in the
22 Chapter J report (Sautner et al. in press
23 2007). Hereinafter, the term 'finished
24 water' will be used."

25 Did I read that correctly?

1 A. Yes.

2 Q. So I will represent to you that
3 Chapter J was never published. However, a
4 draft of Chapter J was produced in this
5 litigation with the Bates Number
6 CLJA_WATERMODELING_05-22 -- excuse me --
7 212246 through 212309.

8 Have you reviewed the draft of
9 Chapter J?

10 A. No.

11 Q. Do you know whether any testing
12 was done to compare the concentrations of
13 contaminants delivered to the water treatment
14 system with the concentrations of
15 contaminants delivered to a person's home?

16 A. Not that I'm aware of.

17 Q. Okay. Please turn to Page A13
18 of Exhibit 9. That's the page ending in
19 Bates Number 615664.

20 A. Got it.

21 Q. Okay. So there's a sort of
22 list of paragraphs on this page. One of them
23 starts with the Number 4.

24 Do you see that?

25 A. Yes.

1 Q. So this says "The monthly
2 concentrations of PCE assigned to finished
3 water at the Tarawa Terrace WTP were
4 determined using a materials mass balance
5 model (simple mixing) to compute the
6 flow-weighted average concentration of PCE.
7 The model is based on the principles of
8 continuity and conservation of mass (Masters
9 1998).

10 Did I read that correctly?

11 A. Yes.

12 Q. Do you know what a materials
13 mass balance model is?

14 A. I know what they're describing
15 here, yes.

16 Q. So you agree that simple mixing
17 flow-weighted average has no calculation
18 simulating processes where contaminants are
19 lost during storage, treatment, or
20 distribution?

21 A. That's correct. It's simply
22 taking the -- the pumping rates and
23 concentrations of the supply wells to
24 determine what the resulting concentration of
25 the mixed water would be at the water

1 treatment plant.

2 Q. So a simple mixing
3 flow-weighted average wouldn't explicitly
4 take into account something like sorption or
5 volatilization?

6 MS. BAUGHMAN: Object to the
7 form.

8 THE WITNESS: That's not what
9 it's meant to do, no.

10 Q. BY MR. ANTONUCCI: It's true
11 that ATSDR's Tarawa Terrace model did not
12 include a calculation simulating contaminant
13 losses during storage, treatment, or
14 distribution; right?

15 A. Not that I'm aware of.

16 Q. You agree that ATSDR's Tarawa
17 Terrace model simulated PCE concentrations as
18 equivalent to the mixture of water straight
19 out of the wells?

20 A. Yes.

21 Q. And ATSDR assumed continuity
22 and conservation of mass in its simple mixing
23 model; right?

24 A. Yes.

25 Q. Do you agree that some losses

1 during treatment, storage, and distribution
2 are inevitable?

3 MS. BAUGHMAN: Object to the
4 form. Outside the scope.

5 THE WITNESS: That is not my
6 area of expertise. I don't have an
7 opinion on that.

8 MR. ANTONUCCI: Okay. I'd like
9 to break for lunch now.

10 THE WITNESS: Great.

11 THE VIDEOGRAPHER: We're off
12 the record. The time is 12:10.
13 (The lunch break was taken from
14 12:10 p.m. until 1:13 p.m.)

15 THE VIDEOGRAPHER: We're back
16 on the record. The time is 1:13.
17 This is Media Number 3.

18 Counsel may proceed.

19 Q. BY MR. ANTONUCCI: All right.
20 Dr. Jones, I remind you that you are still
21 under oath.

22 Have you discussed the
23 substance of your testimony with anyone
24 during the break?

25 A. Only superficially.

1 Q. Can you describe what you mean
2 by that, please.

3 A. Hey, Norm, you're doing a good
4 job.

5 Q. Okay. Did you discuss it --
6 did you discuss it any further?

7 A. No.

8 Q. All right. A couple of things
9 I want to circle back on from before the
10 break. First is going to be this document,
11 which I will mark as Exhibit 10.

12 (Exhibit 10 was marked for identification.)

13 THE WITNESS: Okay.

14 Q. BY MR. ANTONUCCI: All right.
15 Dr. Jones, do you know what this is?

16 A. Yes.

17 Q. What is it?

18 A. It appears to be the model
19 simulation results based on varying the
20 reaction coefficient over three different
21 values, and it shows the resulting
22 concentrations at the water treatment plant
23 and at Well TT-26.

24 Q. Okay. What are the three
25 different values that you used to perform

1 this analysis?

2 A. One of which was the -- the --
3 the middle line. The red line is the .005,
4 which was what was used in the original ATSDR
5 model. And one of those, as I understand,
6 was a .004 value that was suggested or used
7 by Faye. And then another one was a .006
8 value, which was suggested by -- by Dr. Aral.

9 Q. Okay. And for all of those
10 values, those are different values of
11 reaction rates; is that right?

12 A. Yeah, so the only thing that
13 was changed in the model was the reaction
14 rate, and then we looked at what impact that
15 had on the simulated concentrations for these
16 two outputs.

17 Q. Okay. And when did you perform
18 this analysis?

19 A. A week or two ago.

20 Q. Okay. So there are two graphs
21 here. I want to make sure we're looking at
22 the same one. There's one that has a caption
23 that says "MT3DMS," "Calibrated," and
24 "TechFlowMP" in the top right. Then there's
25 one that has the sort of legend in the middle

1 of the page; is that right?

2 A. Top left, yeah.

3 Q. Excuse me, thank you.

4 A. Yep.

5 Q. So what you just described, was
6 that the version of the document with the
7 legend in the center of the page or the left?

8 A. So the one with the legend in
9 the center is the simulated concentrations at
10 the Tarawa Terrace water treatment plant, and
11 the one with the legend in the upper left
12 corner is the simulated concentrations at
13 Well TT-26.

14 Q. Understood.

15 And are the reaction rates the
16 same for the different categories in both
17 graphs?

18 A. Yes. Yeah, they're both based
19 on the same model results, yeah.

20 Q. And then you also in front of
21 you should have a series of spreadsheets.

22 Do you see those?

23 A. Yes.

24 Q. What -- what do these show?

25 A. So the first column are the

1 monthly dates through the simulation period,
2 and then for each month the second column
3 would be the -- the concentrations at --
4 resulting from -- well, let me back up a
5 little bit.

6 This -- I believe this
7 spreadsheet represents the concentrations at
8 the water treatment plant.

9 Q. Dr. Jones, when you say "this
10 spreadsheet," are you referring to the one
11 with the Bates number ending in 302 or
12 document name ending in 302 up at the top?

13 A. 299.

14 Q. 299, okay.

15 All right. I'm on the Page 1
16 of the spreadsheet with the title
17 CL_PLJ-EXPERT_DAVIS_0000000299.xlsx. Is that
18 where you are?

19 A. Yes.

20 Q. And this is what you were
21 describing in your last answer?

22 A. Yeah, so the first column or
23 the simulated concentrations resulting
24 from -- or excuse me -- the first column
25 after the date it says r00004_orig, that

1 would be the concentrations resulting from
2 the simulation featuring a reaction rate of
3 .004.

4 Likewise, the next column would
5 be the results featuring a reaction rate
6 labeled as -- or corresponding to .0005. And
7 the last column would be the results with a
8 simulation with a reaction rate of .0006.

9 In other words, it's the actual
10 numbers used to generate the plots.

11 Q. Okay. I will ask you to take a
12 look through CL_PLJ-PLG-EXPERT_DAVIS_299 and
13 ask if you're familiar with the data
14 contained in this spreadsheet?

15 A. Yes, I am. I generated it.

16 Q. Okay. I'm interested in the
17 difference between the values in the three
18 columns, the Robert Faye column, the ATSDR
19 column, and the Dr. Aral column.

20 If I refer to them that way, do
21 you understand what I mean?

22 A. Yeah.

23 Q. Okay. What -- where is the
24 smallest discrepancy between the three data
25 points? At what time?

1 A. The beginning.

2 Q. Okay. Is that because they all
3 simulate a concentration of 0 micrograms per
4 liter?

5 A. That's partly why.

6 Q. Okay. Where is the largest
7 discrepancy between any two columns on this
8 spreadsheet?

9 A. On the spreadsheet, I -- I'm
10 not sure. If I had the spreadsheet in front
11 of me I could use an Excel function to find
12 that, but looking at the graphs, it appears
13 that the -- the -- the spread between the
14 curves increases until roughly late '60s and
15 then it stays relatively constant after that
16 in terms of the log-log plot.

17 Overall, they're -- in my
18 opinion, they're really close. In terms of a
19 model result, this is what I would call the
20 models being highly insensitive to changes in
21 the reaction rate.

22 Q. Did you just use the phrase
23 "log-log plot"?

24 A. A log plot. So that means the
25 vertical axis is based on the log of the

1 concentrations.

2 Q. Okay. And both of these graphs
3 use a logarithmic scale for the Y axis; is
4 that right?

5 A. That's correct.

6 Q. You I think stated that the
7 concentrations, the spread between the
8 concentrations seems to stabilize around the
9 late '60s; is that what you said?

10 A. Well, there's -- there's
11 actually a reason for that.

12 Q. Okay.

13 A. Well, there's a reason why the
14 curves are closer together in the early
15 years, and that's because, for example, the
16 TT-26 plot, this is the model simulated
17 concentrations at Well TT-26, and the source
18 of the contaminants at the ABC Cleaners is
19 some distance away from Well TT-26.

20 And so it takes time for the
21 results to get down that far. And it's --
22 you're looking at -- there is a -- an early
23 arrival, but it's at a really small
24 concentration as a function of the dispersion
25 coefficients used in the model.

1 So just the fact -- and then
2 the Tarawa Terrace water treatment plant
3 concentrations, those are a function of
4 supply wells which are all downgradient.

5 The point being, it takes time
6 for the contaminants to reach those wells
7 after it leaves the source and, therefore,
8 there's not much spread.

9 And you can see the same
10 narrowing of the band in the -- in the
11 probabilistic -- or excuse me -- the
12 uncertainty analysis results, which is
13 results from the same phenomenon I'm
14 describing.

15 Q. Okay. If you could please turn
16 to Page 5 of that same spreadsheet, which has
17 the title ending in 299.xlsx. I'm just sort
18 of looking at the bottom row. The date is
19 February 1, 1967.

20 Do you see that?

21 A. Yeah.

22 Q. So it looks like under the
23 point I think 004 reaction rate, the PCE
24 concentration in micrograms per liter is
25 67.16, and then many further digits; is that

1 right?

2 A. Correct.

3 Q. Okay. And for the ATSDR value,
4 that's the 0.005, it's 60.37; is that right?

5 A. Correct.

6 Q. And for the Aral value, and
7 that's the .006, it's 54.3; right?

8 A. Correct.

9 Q. By my math, that's a -- in
10 terms of percentages, it's a pretty
11 widespread, don't you think?

12 MS. BAUGHMAN: Object to the
13 form.

14 THE WITNESS: In terms of
15 contaminant concentrations which are
16 log normally distributed, I would
17 consider that a relatively small
18 chance spread of values.

19 Q. BY MR. ANTONUCCI: Okay. What
20 do you mean by contaminant concentrations are
21 log normally distributed?

22 A. Sure. That means there's a --
23 a statistical analysis you can run on data.
24 When a parameter is log normally distributed
25 means the values cover a very broad range of

1 values over several orders of magnitude.

2 And if you refer to the
3 rebuttal report, Exhibit 7, this is where I
4 can -- let's see. Give me a second to find
5 the page I'm looking at.

6 MS. BAUGHMAN: You can use
7 these, too, if that helps.

8 THE WITNESS: Okay, I got it
9 right -- okay. Figure 3 of the
10 rebuttal report. In this case I took
11 the 318 observed PCE concentrations
12 and ran a statistical analysis to
13 generate a histogram. And if a
14 parameter is log normally distributed,
15 you see that classic bell-shaped
16 curve.

17 And so this clearly indicates
18 that the PCE values are log normally
19 distributed, which is very typical of
20 concentration data, and, therefore --
21 that's one of the reasons why people
22 almost always show when they plot
23 concentration data, use a log scale
24 for the concentrations.

25 Q. BY MR. ANTONUCCI: When you

1 plot concentrations on a logarithmic scale
2 like you've done here --

3 A. Yeah.

4 Q. -- numbers that are -- what's
5 the benefit of using a logarithmic scale?
6 Can you explain that to me?

7 A. It captures -- given that
8 there's a high variability in concentration
9 data and the fact that they are log normally
10 distributed, it is considered to be the
11 proper way to -- to show them.

12 And so, yeah, it will -- it
13 also allows you to -- one of the benefits is
14 it doesn't compress the lower part of the
15 plot. So it allows you to get a level of
16 detail on the very small concentrations that
17 you wouldn't get in a -- in a -- in a non --
18 in a normal arithmetic scale.

19 Q. At the higher concentrations,
20 would the lines be further apart if you had
21 used an arithmetic scale here?

22 A. Yes.

23 MR. ANTONUCCI: All right. I'm
24 going to ask that you please mark
25 Exhibit 11 for identification.

1 (Exhibit 11 was marked for identification.)

2 Q. BY MR. ANTONUCCI: Okay.

3 Dr. Jones, this is ATSDR's Analyses of
4 Groundwater Flow, Contaminant Fate and
5 Transport, and Distribution of Drinking Water
6 at Tarawa Terrace and Vicinity, U.S. Marine
7 Corps Base Camp Lejeune, North Carolina:
8 Historical Reconstruction and Present-Day
9 Conditions Chapter F: Simulation of Fate and
10 Transport of Tetrachloroethylene (PCE).

11 Have you seen this before?

12 A. Yes.

13 Q. And for the record, this
14 document has the Bates range
15 CLJA_WATERMODELING_01-0000093047 through
16 93114.

17 Dr. Jones, could you please
18 turn to Page F28 of this report. That's the
19 page with Bates number ending in 93086.

20 A. Sure.

21 Q. Thanks very much.

22 All right. So I am reading on
23 the last full paragraph of Page F28. This
24 says "The PCE concentrations at water-supply
25 Well TT-26 on September 25, 1985, and

1 July 11, 1991, were 1,100 and 350 micrograms
2 per liter, respectively, and the elapsed time
3 was 2,151 days (Table F2). Applying these
4 data to Equation 3 yields a degradation rate
5 of 0.00053 per day. Potentiometric levels
6 shown on Figure F7 and F8 indicate that Well
7 TT-26 is located on a direct advective
8 pathway from ABC One-Hour Cleaners. Thus,
9 PCE mass migrates downgradient toward and
10 away from Well TT-26. To the extent
11 migration of PCE mass toward and away from
12 Well TT-26 occurred at about equal rates from
13 1985 to 1991, the compound degradation rate
14 of 0.00053 per day approximates a long-term
15 average degradation rate. On the other hand,
16 if a significant quantity of the PCE degraded
17 in the vicinity of Well TT-26 was replaced by
18 advection, then a degradation rate computed
19 using Equation 3 is probably a minimum rate.

20 "Half-lives of PCE reported in
21 the literature range from about 360 to
22 720 days (Lucius and others 1990). Applying
23 these half-lives to Equation 3 yields
24 first-order degradation rates ranging between
25 .001 and .002 per day, about twice to four

1 times the rate computed using concentrations
2 at water-supply Well TT-26. An initial
3 first-order degradation rate of 0.00053 per
4 day was applied to the MT3DMS model uniformly
5 to every layer for all stress periods. The
6 final calibrated degradation rate was 0.00050
7 per day, similarly applied."

8 Did I read that correctly?

9 A. Yes.

10 Q. So it seems that Robert Faye,
11 the author of this report, is saying that a
12 higher degradation rate here could be
13 warranted; is that right?

14 MS. BAUGHMAN: Object to the
15 form.

16 THE WITNESS: It looks to me
17 like he's -- if that's who wrote this,
18 explaining the logic that was used to
19 calculate the degradation rate that
20 was used in the model, .0005.

21 Q. BY MR. ANTONUCCI: Is there a
22 reason that you did not calculate -- or
23 perform sensitivity analysis using the values
24 from this portion of Chapter F?

25 MS. BAUGHMAN: Object to the

1 form.

2 THE WITNESS: We were asked to
3 perform an evaluation using the three
4 values specified.

5 Q. BY MR. ANTONUCCI: Who asked
6 you to do that?

7 A. The legal team.

8 Q. All right. You can put that to
9 the side. Thanks, Dr. Jones.

10 All right. Dr. Jones, did you
11 review the model parameters that ATSDR
12 subjected to probabilistic analysis?

13 A. Yes, I read a summary of their
14 probabilistic analysis. I'm not sure I
15 remember all the details, but I did review
16 that.

17 Q. Beyond reading the summary, did
18 you -- beyond reading the summary, did you
19 otherwise evaluate the model parameters ATSDR
20 subjected to probabilistic analysis?

21 MS. BAUGHMAN: Object to the
22 form.

23 THE WITNESS: No.

24 Q. BY MR. ANTONUCCI: You used all
25 the same model parameters in your post-audit

1 that ATSDR used in the calibrated model; is
2 that right?

3 A. Correct.

4 Q. Did you perform any independent
5 evaluation of the appropriateness of those
6 parameters?

7 A. No.

8 Q. Okay. Dr. Jones, are you aware
9 of any critiques of ATSDR's Tarawa Terrace
10 model?

11 A. Yes.

12 Q. Okay. Well, first, which
13 critiques are -- are you aware of?

14 A. The critiques first and
15 foremost by the Department of Justice experts
16 we reviewed earlier.

17 Q. Are you aware of any other
18 critiques of ATSDR's Tarawa Terrace model?

19 A. I know that there was a review
20 by an NRC panel. There was a review by a --
21 a peer review by a panel of experts. I'm not
22 sure I would call those critiques, but
23 they're reviews. And I'm aware of -- of a
24 paper published by Prabhaker Clement in The
25 Groundwater Journal.

1 Q. Are you familiar with critiques
2 that the Department of the Navy has made of
3 ATSDR's Tarawa Terrace model?

4 A. Yes, I've seen reference to
5 those as well.

6 Q. Okay. Are you aware of any
7 other critiques of ATSDR's Tarawa Terrace
8 model?

9 A. Not that I can think of at the
10 moment.

11 MR. ANTONUCCI: All right. I
12 am going to mark for exhibit -- for
13 identification Exhibit 12.
14 (Exhibit 12 was marked for identification.)

15 Q. BY MR. ANTONUCCI: For the
16 record, this document has the Bates range
17 CLJA_HEALTHEFFECTS-0000000479 through 517.

18 Can you look up at me,
19 Dr. Jones, after you've finished looking
20 through that.

21 A. Sure.

22 MS. BAUGHMAN: Did you want him
23 to read it or just flip through it?

24 Q. BY MR. ANTONUCCI: Dr. Jones,
25 you've mentioned you're aware of the NRC

1 critique of -- or the NRC's review of the
2 Camp Lejeune modeling done by ATSDR; is that
3 right?

4 A. That's correct.

5 Q. Have you read this before?

6 A. I have skimmed through it, and
7 I can't say I've read every part of it, no.

8 Q. You cited to this in your
9 rebuttal report, didn't you?

10 A. Yes.

11 Q. How did you decide which
12 portions to read carefully and which portions
13 to skim?

14 A. I -- there were in the -- I
15 remember reading in the documents somewhere a
16 rebuttal to this from Morris Maslia, and so
17 I -- I read -- I was aware with -- of some of
18 the concepts in -- in this document and in
19 the rebuttal.

20 And in the context of the -- of
21 the post-audit that we did, there were some
22 sections that seemed relevant to things we
23 were discussing.

24 Q. Okay. Dr. Jones, you agree
25 that the basis used for setting the values of

1 calibration targets was unclear for ATSDR's
2 TT model?

3 A. Yes.

4 Q. I ask that you turn to Page 49
5 of the Exhibit 12.

6 A. Okay.

7 Q. I am looking at the one, two,
8 three, fourth bullet point from the top.

9 Do you see that? The sentence
10 starting with "The PSOpS."

11 A. Uh-huh.

12 Q. This says "The PSOpS modeling
13 study is based on the premise that an
14 optimization model can be used to evaluate
15 pumping stresses. Without site-specific
16 pumping data and water-quality data, the
17 results will be nonunique and uncertain."

18 Did I read that correctly?

19 A. Yes.

20 Q. That's a correct statement,
21 isn't it?

22 MS. BAUGHMAN: Object to the
23 form.

24 THE WITNESS: I'm not familiar
25 enough with the context to say with

1 certainty whether that's a correct
2 statement or not.

3 Q. BY MR. ANTONUCCI: Okay. Is
4 this one of the sections that you skimmed or
5 one of the sections you reviewed carefully?

6 A. I don't -- I don't recall
7 reading this specific bullet point.

8 Q. Okay. On the next bullet point
9 down the last sentence says "The difference
10 indicates that the real system is highly
11 transient and that the model did not account
12 for temporal and spatial averaging effects."

13 That's a correct statement,
14 Dr. Jones, isn't it?

15 MS. BAUGHMAN: Object to the
16 form.

17 THE WITNESS: I'm not willing
18 to say whether or not that's correct
19 or not.

20 Q. BY MR. ANTONUCCI: Why not?

21 A. You just read one sentence at
22 the end of a paragraph, so I'm --

23 Q. Okay.

24 A. Asking me whether to say
25 whether it's true or not, I would need to

1 explore the full context of what they're
2 describing before I could have an opinion as
3 to whether or not that's a true statement.

4 Q. Sure. I'll start from the
5 beginning of that bullet point there. That's
6 the fifth from the top.

7 It says "Review of water
8 quality monitoring data indicates substantial
9 temporal variability even at a single well."

10 You agree with that statement,
11 don't you, Dr. Jones?

12 A. Yes.

13 Q. Okay. "For example, the seven
14 measurements taken on Well TT-26 from January
15 to September 1985 indicates that the
16 concentrations at this well varied from 3.8
17 to 1,580 micrograms per liter (see Table
18 2-8). The model predictions for the same
19 time frame range from 732 to 804 micrograms
20 per liter."

21 Did I read that correctly?

22 A. Yes.

23 Q. "The difference indicates that
24 the real system is highly transient and that
25 the model did not account for temporal and

1 spatial averaging effects."

2 Did I read that correctly?

3 A. Yes.

4 Q. Now that you've seen the full
5 paragraph, are you willing to offer an
6 opinion about the validity of the last
7 sentence?

8 MS. BAUGHMAN: Object to the
9 form.

10 THE WITNESS: I'm not sure what
11 they mean by "temporal and spatial
12 averaging effects." The fact that the
13 simulated concentrations differ from
14 the observed concentrations which vary
15 quite significantly is a phenomenon
16 that we've discussed at length in
17 our -- both our post-audit report and
18 our rebuttal document.

19 There's a -- there are very
20 good reasons why one wouldn't expect
21 an exact match between the simulated
22 and observed values and why there
23 would be much greater variance in the
24 observed values versus the simulated
25 values.

1 Q. BY MR. ANTONUCCI: Okay. We'll
2 get into all of those reasons a little bit
3 later. I'd like to continue reading. This
4 is the second-to-last bullet point on Page 49
5 of Exhibit 12.

6 It says "Reporting absolute
7 predicted concentrations of PCE and its
8 biodegradation byproducts in finished water
9 delivered by the Tarawa Terrace water-supply
10 system with a precision of up to five
11 significant figures without any error bounds
12 (for example, Jang and Aral [2008] report
13 concentrations of PCE at 102.10 micrograms
14 per liter, TCE at 4.33 micrograms per liter,
15 DCE at 13.75 micrograms per liter, and vinyl
16 chloride at 7.50 micrograms per liter)
17 provides an unwarranted sense of certainty.
18 Such reporting can contribute to
19 misconceptions by the public and the
20 epidemiology-research community such that
21 water-modeling efforts can produce a specific
22 value for contaminant concentration. Posting
23 such precise point estimates for PCE, TCE,
24 DCE, and vinyl chloride concentrations on
25 public web pages (www.atsdr.cdc.gov/sites/

1 lejeune) and encouraging former Camp Lejeune
2 marines and their families to find the
3 estimated exposure concentrations of these
4 contaminants leads to a misleading perception
5 that reactive transport models can make
6 accurate predictions."

7 Dr. Jones, is it your opinion
8 that providing numbers such as the ones
9 mentioned in this paragraph without error
10 bars can provide an unwarranted sense of
11 certainty?

12 MS. BAUGHMAN: Object to the
13 form. Outside the scope.

14 THE WITNESS: I think that
15 depends on the context.

16 Q. BY MR. ANTONUCCI: Okay. The
17 last bullet point on this page, that's
18 Page 49 of Exhibit 12, says "In the absence
19 of data, historical reconstruction efforts
20 that use groundwater models can only provide
21 a general conceptual framework for what
22 happened at the site and why. At best, such
23 models may be used only to estimate a range
24 of possible concentrations. Without
25 historical geochemical data, the uncertainty

1 associated with many of the input parameters
2 (such as the biodegradation parameters) could
3 be very high. In addition, current
4 understanding of subsurface reactive
5 transport processes is inadequate, so"
6 reactive -- excuse me -- "so transport models
7 cannot be expected to provide definitive
8 concentration estimates especially for
9 biodegradation by products."

10 Did I read that correctly?

11 A. Yes.

12 Q. Okay. That's a true statement,
13 isn't it, Dr. Jones?

14 MS. BAUGHMAN: Object to the
15 form. That's about five statements,
16 it's not one.

17 THE WITNESS: Yeah, well, I
18 think this, as is the case with some
19 of the reviews, may tend to
20 overestimate, overstate the absence of
21 data. I think they did have quite a
22 bit of data to use to build the flow
23 and transport model. Certainly enough
24 to make it a reasonable and valuable
25 model.

1 And I think they did a
2 reasonable job of simulating or
3 estimating the uncertainty in the
4 model through their Monte Carlo
5 analysis and presenting that to the
6 public in their reports.

7 Q. BY MR. ANTONUCCI: Do you agree
8 that in the absence of data, historical
9 reconstruction efforts that use groundwater
10 models can only provide a general conceptual
11 framework for what happened at the site and
12 why?

13 MS. BAUGHMAN: Object to the
14 form.

15 THE WITNESS: No, I don't agree
16 with that.

17 Q. BY MR. ANTONUCCI: Why not?

18 A. I think it -- it's -- I --
19 where's the part you read again?

20 Q. That's the first sentence of
21 the last bullet point on --

22 A. Okay.

23 Q. -- Page 49 of Exhibit 12.

24 A. I think they can go beyond
25 providing a general conceptual framework, as

1 was done in the case here.

2 I think what they did with the
3 historical reconstruction is a perfectly
4 valid application of groundwater and
5 contaminant transport model.

6 Q. What's your understanding of
7 what the NRC is?

8 MS. BAUGHMAN: Object to the
9 form.

10 THE WITNESS: National Research
11 Council. It's a -- it's part of the
12 National Academy of Sciences.

13 Q. BY MR. ANTONUCCI: Is the NRC a
14 well respected institution?

15 MS. BAUGHMAN: Object to the
16 form.

17 THE WITNESS: Generally it --
18 they -- they use experts in their
19 work.

20 Q. BY MR. ANTONUCCI: Are you
21 aware that Dr. Clement served as a reviewer
22 for this report?

23 A. Yes.

24 Q. Earlier you mentioned you're
25 familiar with a critique of ATSDR's water

1 modeling efforts from -- by Dr. Clement; is
2 that right?

3 A. That's correct.

4 Q. Do you have any opinions on
5 that article?

6 A. I do.

7 Q. Okay. What are they?

8 A. Well, as I mentioned, Professor
9 Clement is a good friend of mine and he has a
10 habit of writing thought -- thought-provoking
11 issue papers. And he has a number of these
12 over the years that are meant to push buttons
13 and stimulate conversations.

14 He typically asks me to review
15 his draft manuscripts of his issue papers and
16 we have a lot of fun discussing the issues,
17 and he enjoys getting reactions and getting
18 people to talk about things.

19 I did not review this
20 particular article when he published it, nor
21 have we had extensive conversations about it,
22 but it certainly follows the pattern. And if
23 you read his response to Morris' response, in
24 the opening paragraphs he does indicate that
25 one of his objectives was to stimulate

1 conversation with that.

2 That being said, when I read
3 the paper, it seemed that a lot of his
4 critiques were -- were directed at the
5 TechFlow -- use of the TechFlowMP model in
6 the modeling study. And in fact he -- I
7 recall he suggested that a better approach
8 would be to stick perhaps with MODFLOW and
9 MT3DMS, which is what we've done in this
10 study and what I think the -- you know,
11 certainly what's documented in Chapters C
12 and F.

13 And I also think he made some
14 fundamental logical errors in his critique of
15 the -- of the modeling effort.

16 For example, he stated that
17 with a hindcasting model, the farther you go
18 back in time, the greater the uncertainty.
19 And I -- I do not agree with that, because
20 probably the most certain state of this model
21 is 1953 when it started. That's a point in
22 time when you have a definitive
23 representation of what the model should look
24 like.

25 So they -- they had

1 concentration data at the water treatment
2 plant in the -- in the mid '80s. They had
3 concentrations at the wells. And so you
4 could argue that there's -- there's less
5 uncertain -- there's data at that point.

6 So you're going to from a
7 state -- a known state to another known
8 state. And so there's uncertainty along that
9 path, but you're simulating between two
10 relatively precise states.

11 Another issue I had with the
12 model with his analysis is he pointed to
13 the -- the uncertainty band of the simulated
14 concentrations at well -- at the Tarawa
15 Terrace water treatment plant, and he looked
16 at the -- the narrow band of uncertainty in
17 the early years of the results as we were
18 discussing a little bit earlier in this
19 deposition.

20 And he said this is wrong
21 because it implies that -- that there's no --
22 there's very little uncertainty at that point
23 in time, which is wrong. And I believe
24 Spiliotopoulos made the same critique about
25 the narrow band there.

1 And as I explained earlier,
2 there's a very important reason why the band
3 is narrow. The -- the -- that plot shows the
4 concentrations at the water treatment plant,
5 which is derived from concentrations at
6 supply wells that are a significant distance
7 away from the source.

8 So no matter what -- no matter
9 what perturbations or variation you had in
10 the model in those early stages, you would
11 get very small concentrations downgradient
12 during the first few years.

13 So it has -- has nothing to do
14 with falsely representing the uncertainty.
15 That -- the fact that that band is narrow is
16 a natural mathematical byproduct of the -- of
17 the geometry and the -- and the physics at
18 the site.

19 Q. Okay. Do you have any other
20 fundamental logical errors that you'd like to
21 point out?

22 A. No.

23 Q. All right. When was the last
24 time you reviewed the Clement article?

25 A. I -- a couple of weeks ago,

1 maybe.

2 Q. And you said that you haven't
3 discussed it with Dr. Clement; is that right?

4 A. That's correct.

5 Q. Why not?

6 A. I figured it would be best as
7 I'm serving as an expert on this case and
8 knowing his past involvement to -- to not
9 have that conversation. Save it for a later
10 time.

11 Q. You don't think he'd want to
12 engage with you in a controversial
13 discussion?

14 A. Oh, I'm sure he would. But I
15 don't want that to -- my personal
16 relationship with him to impact my -- my --
17 my work and my conclusions on this.

18 Q. You mentioned that many of
19 Dr. Clement's critiques were directed at the
20 use of TechFlowMP; is that correct?

21 A. In my reading of the article,
22 that's the -- that's the sense I got. For
23 example, he -- one of his critiques was we
24 shouldn't use cutting-edge research -- we
25 should be careful or reluctant to use

1 cutting-edge research models developed in
2 academic institutions that haven't been
3 thoroughly vetted. That certainly would not
4 apply to -- to MODFLOW and MT3D.

5 Q. Understood.

6 But is it -- is it your opinion
7 that TechFlowMP has not been thoroughly
8 vetted?

9 MS. BAUGHMAN: Object to the
10 form.

11 THE WITNESS: I don't -- I
12 don't -- I don't think it's been
13 vetted to the same degree as MODFLOW
14 or MT3D. That doesn't mean it's not
15 a -- a -- an accurate and valuable
16 model.

17 Q. BY MR. ANTONUCCI: Do you have
18 any opinion on the accuracy and validity of
19 results generated using TechFlowMP?

20 A. No.

21 Q. You have no opinion either way?

22 A. I haven't studied the
23 TechFlowMP results. We focused mainly on the
24 MODFLOW and MT3DS -- MS as -- within the
25 context of the work were asked to do. Was

1 not asked to evaluate TechFlowMP or study it.

2 Q. Okay. It's my understanding
3 that TechFlowMP was generated at the Georgia
4 Institute of Technology by Dr. Aral?

5 A. That's correct.

6 Q. Okay. And that was done for
7 the purpose of the Camp Lejeune study; right?

8 MS. BAUGHMAN: Object to the
9 form. Foundation.

10 THE WITNESS: I'm not sure what
11 it was -- if that's why it was
12 developed or not. I'm just not -- I'm
13 not aware.

14 Q. BY MR. ANTONUCCI: Okay. How
15 many other groundwater modeling projects have
16 you evaluated that use TechFlowMP?

17 A. I don't recall seeing any
18 other.

19 Q. This is the only one you've
20 evaluated that's used TechFlowMP?

21 A. That's correct.

22 Q. Okay. How about published
23 studies, things you've reviewed in the
24 literature. Have you seen TechFlowMP used
25 anywhere else?

1 A. Not that I recall.

2 Q. Okay. All right. I would like
3 to discuss hindcasting.

4 When I say the word
5 "hindcasting," what does that mean to you?

6 A. Using a model to look back in
7 time and characterize what happened in the
8 past in an aquifer.

9 Q. Okay. ATSDR's groundwater flow
10 and transport models are hindcasting models;
11 right?

12 A. That's what they were primarily
13 developed for, yes, to do a historical
14 reconstruction is another term for
15 hindcasting.

16 Q. So the -- would you consider
17 those terms, "historical reconstruction" and
18 "hindcasting" to be synonyms?

19 A. Yeah.

20 Q. Have you ever constructed a
21 historical reconstruction or hindcasting
22 model?

23 A. Yes.

24 Q. Okay. I think we discussed a
25 few of those at the beginning of the

1 deposition; is that right?

2 A. Correct.

3 Q. Are there any others that we
4 didn't already mention?

5 A. Yeah. One in particular, you
6 may or may not be familiar with the -- with
7 the Woburn case near Boston, Massachusetts.

8 Early in my career I became
9 interested in that case after reading the
10 book A Civil Action and learning about the --
11 at that site they had PCE contamination in
12 the groundwater, which then traveled to some
13 municipal supply wells resulting in a cluster
14 of childhood leukemia and other things, I
15 believe, in the -- in the Woburn
16 neighborhood.

17 And I became very interested in
18 the case and I read up on it and I contacted
19 a lot of -- I knew some of the experts who
20 had been involved in the study, such as
21 George Pinder, and I contacted a number of
22 the people who were involved and asked if
23 they had any data they could share with me.

24 And so I collected a wide
25 variety of data on the site, which I then put

1 into a website, Woburn hydrogeologic data, or
2 something I think I called it.

3 And then as I was teaching a
4 graduate course on contaminant -- on
5 groundwater modeling, I ended up developing a
6 series of exercises where each time I teach
7 the class, we study the case and I have the
8 students build groundwater models, and then
9 take opposing sides in the case and critique
10 each other's models and -- and estimate
11 the -- whether or not the contaminant would
12 have reached the wells within a certain time
13 frame and answer questions like that.

14 I was able to travel to a
15 symposium at Harvard Law School on the case
16 and interact with a lot of the people
17 involved with it, and over the years a number
18 of other university courses have adapted this
19 same set of exercises and materials and
20 content that I developed for this particular
21 model.

22 MR. ANTONUCCI: I'm showing you
23 what I will have marked for
24 identification as Exhibit 19.

25 THE REPORTER: 19?

1 MR. ANTONUCCI: Excuse me, 13.

2 Thank you.

3 (Exhibit 13 was marked for identification.)

4 Q. BY MR. ANTONUCCI: Dr. Jones,
5 do you recognize this?

6 A. Yes, I do.

7 Q. How do you recognize this?

8 A. This is a part of the Woburn
9 case study that I just described to you.
10 This is one of the pieces of information that
11 I provide to my students.

12 Q. Is this a page from the CE 547
13 website?

14 A. Yes, it is.

15 Q. Did you -- did you create this
16 web page?

17 A. Yes, I did.

18 Q. Okay. And have you visited it
19 in the past?

20 A. Yes.

21 Q. Okay. Have you read the
22 contents of this web page before?

23 A. Yeah, I wrote this web page.

24 Q. Okay. And do you currently
25 remember the contents of this web page?

1 A. Yes.

2 Q. Okay. I'd like for you to look
3 at the italicized text in the center which
4 starts with the word "First"?

5 A. Yes.

6 Q. This says "First: Had the
7 plaintiffs established by a preponderance of
8 the evidence that any of the following
9 chemicals - TCE, perc, and 1,2
10 transdichloroethylene - were disposed on the
11 Beatrice land after August 27, 1968 (in the
12 case of W.R. Grace, after October 1, 1964,
13 and the date Well G had opened), and had
14 these chemicals substantially contributed to
15 the contamination of the wells before May 22,
16 1979?"

17 Did I read that correctly?

18 A. Yes.

19 Q. That appears to be from the
20 jury instructions from Judge Skinner; is that
21 right?

22 A. Yes. And I took this from the
23 book A Civil Action published in 1995 by
24 Harr.

25 Q. Okay. So the question posed to

1 the groundwater modeling experts at Woburn
2 was whether or not contaminants could have
3 reached the pumping wells through the
4 groundwater flow within a certain time frame;
5 is that right?

6 MS. BAUGHMAN: Object to the
7 form.

8 THE WITNESS: Can you state
9 that again.

10 Q. BY MR. ANTONUCCI: The question
11 posed to the groundwater modeling experts at
12 Woburn was whether or not contaminants could
13 have reached the pumping wells through
14 groundwater flow in a certain time frame;
15 right?

16 MS. BAUGHMAN: Object to the
17 form.

18 THE WITNESS: Yeah, I think
19 that's accurate.

20 Q. BY MR. ANTONUCCI: Okay. Were
21 the groundwater modelers at Woburn asked to
22 determine the concentrations of contaminants
23 in the wells at different points in time for
24 determining an individual's potential
25 exposure to contaminants?

1 MS. BAUGHMAN: Objection.

2 Form. Foundation.

3 THE WITNESS: I don't recall.

4 Q. BY MR. ANTONUCCI: You don't
5 know if the groundwater modelers generated a
6 list of contaminant exposure doses?

7 A. As part of this initial case,
8 I -- I'm not sure.

9 Q. Okay.

10 A. I know that this -- after
11 this -- this civil action was concluded,
12 there was an extensive study by the -- by the
13 USGS, there was a model built. It also
14 became a Superfund site and, you know, there
15 were a lot of different kinds of analyses
16 that were performed.

17 I also became friends with a
18 professor at Ohio State University who
19 studied this extensively and did a number of
20 simulations, including calculating the
21 concentrations at the wells and then putting
22 those concentrations into a water
23 distribution model to simulate the
24 resulting -- the concentrations of water
25 delivered to different neighborhoods in

1 Woburn, and then he compared that to
2 incidents of leukemia in the children in
3 those neighborhoods who were in -- in utero
4 when they -- their mothers drank the water,
5 and found a really strong correlation. And
6 that study was then published in Nature, the
7 journal Nature and got a lot of recognition.

8 So my point is there -- there
9 are a lot of different modeling efforts and
10 analyses associated with this case. It's
11 been very highly studied.

12 Q. Okay. Specifically for the
13 question you ask your students --

14 A. Yes.

15 Q. -- the project you ask them to
16 recreate --

17 A. Yes.

18 Q. -- are they determining
19 specific concentrations of contaminants at
20 wells?

21 A. No. I have them focus purely
22 on travel time and whether or not the
23 contaminants -- it's more likely than not
24 that the contaminants would have reached
25 Wells G and H within the time frame

1 associated with this case.

2 Part of my objective is to --
3 is to frame a -- you know, the case study
4 around an amount of work that could
5 reasonably be done in the course of a
6 university semester.

7 Q. Sure. The other studies you
8 were discussing, the I think USGS and
9 others --

10 A. Yeah.

11 Q. -- those use a EPA net water
12 distribution system modeling software to
13 estimate the movement of contaminants through
14 the water distribution system; right?

15 A. I don't know about the USGS. I
16 know the study that was done at Ohio State
17 University did that.

18 Q. Okay. The -- the USGS study --
19 or what's -- how would you describe your
20 level of familiarity with that study?

21 A. I know that they -- they built
22 a groundwater model. I have copies of the
23 model. I've looked at the model and the
24 outputs. I looked at the boundary conditions
25 they found, the -- the conceptual model they

1 used and -- and that -- the manner in which
2 they built that model informed the guidelines
3 that I give my students to -- to recreate the
4 model each semester I -- I teach it. We use
5 the same basic conceptual model and boundary
6 conditions used by the USGS. And I believe
7 we may calibrate to the same data that they
8 had.

9 Q. The USGS study did not
10 determine specific concentrations of
11 contaminants individuals in Woburn were
12 exposed to; right?

13 A. I'm not sure. I don't recall.

14 Q. The USGS study bifurcated into
15 two parts; right?

16 A. The USGS? I'm -- not that I'm
17 aware of.

18 Q. The USGS study first looked at
19 whether contaminants could have possibly
20 reached the wells, then whether contamination
21 from the wells would have reached certain
22 neighbors in different proportions.

23 Does that sound like your
24 understanding of the USGS study?

25 MS. BAUGHMAN: Object to form

1 and foundation.

2 THE WITNESS: I think you may
3 be conflating some different things
4 here. But the -- the description in
5 this Exhibit 13 was based on the
6 evidence presented at the original
7 trial, and in that case there were
8 modeling -- a modeling expert for the
9 plaintiffs, another modeling expert to
10 defense. They had different models
11 and argued for the merits of each, and
12 that's the -- that was bifurcated as
13 described in this -- in this issue.

14 Now, the -- the other study I
15 was talking about at Ohio State, that
16 was purely, to my knowledge, an
17 academic study. He had a PhD student
18 that worked on that, and like me, he
19 became interested in the case and did
20 that more extensive analysis.

21 You know, one of the questions
22 in this case -- this was the late
23 '80s, early '90s at a time when our
24 understanding of chlorinated solvents
25 and their impact on health and how

1 they migrate and degrade in an aquifer
2 was not as well understood as it is
3 now, and so there -- that was one of
4 the -- that was one of the issues in
5 the case.

6 And -- and so, again, one of
7 the questions was does -- do these
8 contaminants cause the illnesses that
9 were reported in Woburn.

10 And so one of the objectives of
11 the Ohio State study was he was able
12 to take the -- recreate through the
13 model simulation the concentrations
14 that were reaching the supply wells,
15 and then the next question is once
16 they're in the supply wells, where did
17 they go, right?

18 Because -- and so the EPA net
19 model -- I believe he used EPA net --
20 it was a water distribution model
21 similar to EPA net, then simulated
22 where -- which specific neighbors and
23 houses that would go to. And then
24 they did statistical analysis of the
25 correlation between that water

1 delivery and the incidents of
2 childhood leukemia and found a very
3 strong statistical correlation.

4 Q. Understood.

5 You mentioned that your
6 students use the same calibration data that
7 was available to USGS; is that right?

8 A. That's -- I believe so. I
9 collected my calibration -- I was also in
10 contact with some of the original experts who
11 were involved in the litigation, and so I --
12 whether my calibration data came from the
13 USGS model or theirs, I'm not positive.

14 Q. Okay. Regardless of where it
15 came from --

16 A. Yeah.

17 Q. -- can you describe that data
18 to me?

19 A. Yeah. It -- it is measured
20 water levels at a number of observation wells
21 in the Woburn area, and also there's a --
22 there's a river or a stream that flows
23 through the -- the valley and the -- there
24 were some measure -- and I believe this one
25 was USGS data -- measured the change in flow

1 across that -- between a gauge at the top of
2 where the model is and a gauge at the bottom
3 to determine how much water in this case was
4 gained. There's water flowing from the
5 aquifer to the river, and the magnitude of
6 that was measured.

7 So the students calibrate the
8 MODFLOW model to the water levels at the
9 observation wells and to the stream
10 discharges. The discharges to the streams --
11 stream.

12 Q. Can you use the discharges to
13 the stream to determine the recharge rate of
14 the aquifer?

15 A. Yes, it's actually really
16 helpful because based on the -- the closed
17 nature of the -- of the site, there's only
18 one source of water to the aquifer, and
19 that's through recharge.

20 And then the water leaves the
21 aquifer by being pumped out through the wells
22 that are active at the specific point in
23 time, and also through discharge to the
24 stream.

25 So, in fact, I instruct my

1 students you can actually back calculate the
2 recharge in a spreadsheet using a simple
3 water balance method using that data.

4 Q. What time frame did the water
5 level data cover that you just discussed?

6 A. I don't recall. I would have
7 to go back and look and see. But we build a
8 steady-state model. We don't build a --
9 actually, I take that back. I have them
10 build both a steady-state model and then they
11 have the option to make a transient model,
12 but the calibration is the steady-state
13 conditions.

14 Q. Is that because you don't have
15 well pumping data?

16 A. No -- well, it's partly because
17 it's -- I don't believe we had water-level
18 data over a long period of time. And, again,
19 I have to construct the case study, it's
20 something that a set of students who are
21 brand new to groundwater modeling can do over
22 the course of a semester, so it's -- it's --
23 it's a small aquifer. It's a contained
24 system.

25 Q. Sure. Do you -- do you know if

1 that data is available, the well pumping
2 data?

3 A. Oh, so we have -- we use some
4 pumping data in -- in the case, yeah. There
5 are four wells; there are two industrial
6 wells and then Wells G and H and the pumping
7 data's described somewhere in my website.

8 Q. Do your students calibrate the
9 model to any contamination concentrations?

10 A. No.

11 Q. Were contaminant concentrations
12 available to the water modelers in the
13 lawsuit?

14 A. Yes, I believe so.

15 Q. Do you know roughly what time
16 period that data spanned?

17 A. I don't recall. I know once
18 they -- similar to the Camp Lejeune case,
19 once the chlorinated solvents were discovered
20 in the municipal wells, they -- they shut
21 down the wells and stopped pumping.

22 Q. Okay. So there wouldn't
23 be -- strike that.

24 I'm sorry, were you going to
25 continue?

1 A. Well, that -- there are two
2 types of concentrations data. There's the
3 concentration of the water coming out of the
4 well, which I know they measured that. But
5 then I think at a later point in time they
6 went in and started sampling water at
7 monitoring wells throughout the Aberjona
8 aquifer and collected a set of concentration
9 data from that, which was then used to build
10 the models that were used in the court case.

11 Q. Okay. Maybe zooming out from
12 Woburn --

13 A. Sure.

14 Q. -- talking about groundwater
15 modeling in general.

16 A. Sure.

17 Q. What are the types of data that
18 are required to create a historical
19 reconstruction groundwater model?

20 A. That depends on the context.

21 Q. Sure. Would you ideally have
22 precipitation data for use in creating a
23 hindcasting model?

24 A. Ideally, yes.

25 Q. Okay. And that would help you

1 determine the recharge rate; is that correct?

2 A. That does inform the recharge
3 rate, typically, yes.

4 Q. To calibrate the groundwater
5 flow model, would you say that you need water
6 level data?

7 A. Yes.

8 Q. And for the flow and transport
9 model, would you say that pumping schedules
10 and pumping rates are helpful in creating a
11 hindcasting model?

12 MS. BAUGHMAN: Object to the
13 form.

14 THE WITNESS: I would say,
15 yeah, any of the major, significant
16 what we call stresses, sources and
17 sinks of water you'd want to
18 characterize as best you can based on
19 the data that are available to you.

20 Q. BY MR. ANTONUCCI: How about
21 the properties of the aquifer, like porosity
22 or other parameters similar to that, would
23 that be helpful in generating a groundwater
24 model?

25 A. Yes.

1 MS. BAUGHMAN: Object to the
2 form.

3 Q. BY MR. ANTONUCCI: Ideally,
4 where do you get information about the
5 aquifer properties from?

6 MS. BAUGHMAN: Object to the
7 form.

8 THE WITNESS: It depends on the
9 aquifer properties that you're talking
10 about. One of the ways in which we
11 get hydraulic conductivity, for
12 example, is you can go to the site and
13 perform pump tests where you either
14 inject water or pump water out of the
15 aquifer and watch the -- the response
16 of the aquifer, and from that you can
17 back calculate or infer the hydraulic
18 conductivity in the region surrounding
19 the well.

20 And -- but in some cases we
21 start with our -- our best estimate
22 using scientific and engineering
23 judgment and experience on the
24 parameters, and then use the feedback
25 from the calibration data to help

1 inform those results.

2 For example, recharge is hard
3 to quantify, but once you start
4 running the model, if your recharge
5 rate is too high, the whole aquifer
6 floods and you know that's not
7 realistic; where if your recharge rate
8 is too low, your aquifer gets
9 dewatered.

10 So there are things that you
11 can do as part of the modeling
12 exercise to help narrow down a
13 reasonable range of parameters in your
14 model.

15 Q. BY MR. ANTONUCCI: Okay. I
16 would appreciate if you could please turn to
17 Exhibit 9, Page A27.

18 A. Okay.

19 Q. All right. Page A27 of
20 Exhibit 9, the title of the table is "Summary
21 of model-derived values and observed data of
22 tetrachloroethylene at water-supply wells,
23 Tarawa Terrace U.S. Marine Corps Base Camp
24 Lejeune, North Carolina; is that right?

25 A. That's correct.

1 Q. And it looks like this graph
2 shows the model-derived values versus the
3 observed data at Tarawa Terrace; is that
4 correct?

5 A. Correct.

6 Q. Is it your understanding that
7 this is all of the water supply well data
8 that ATSDR had available?

9 A. I would assume so.

10 Q. Okay. And this is 36 data
11 points; right?

12 A. Yes.

13 Q. Okay. And it looks like they
14 were taken in 1985 and 1991; correct?

15 A. Correct.

16 Q. Okay. Now I'd appreciate if
17 you could turn to Exhibit 6, that's your
18 initial report.

19 A. Okay.

20 Q. And if you could please look at
21 Page 7 in Roman Numerals vii, it's the
22 Executive Summary.

23 A. This is Exhibit 6?

24 Q. Yes.

25 A. Oh, sorry, I thought you said

1 7-I. Okay. Got it.

2 Q. Okay. I'm reading from the top
3 of Page 7, the sentence starting with the
4 word "Despite."

5 A. Yes.

6 Q. It says "Despite the inherent
7 challenges in simulating complex subsurface
8 conditions and dealing with incomplete data,
9 the model effectively simulates long-term
10 trends in contaminant migration."

11 Did I read that correctly?

12 A. Yes.

13 Q. What did you mean by "the
14 inherent challenges in simulating complex
15 subsurface conditions"?

16 A. I think I would probably use
17 this sentence to describe just about any
18 groundwater modeling project that I've been
19 familiar with over the course of my career.

20 When we're looking at
21 groundwater models, we always have -- we're
22 dealing with something that's underground,
23 that you can't directly touch and measure,
24 and so the whole process is based on building
25 the model as best you can from the available

1 data that you have and overcoming, in a
2 reasonable fashion, the -- the lack of more
3 continuous data.

4 Q. Okay. And what did you mean by
5 "dealing with incomplete data"?

6 A. What I just described. I --
7 there -- I've never in my 34 years in this --
8 in this profession and my career encountered
9 a case where someone built a model and said,
10 By golly, we had all the data we needed for
11 this project, right?

12 You're always dealing with
13 incomplete data. But there are standard,
14 established procedures on how to do that and
15 how to assess uncertainty in those cases and
16 how to -- again, I -- I previously -- I
17 mentioned that recharge, which is very hard
18 to measure directly.

19 And so we use indirect methods
20 to -- to pin down the -- the level of
21 recharge. That process is used in multiple
22 ways in building models.

23 MR. ANTONUCCI: Is this

24 Exhibit 14?

25 THE REPORTER: Yes.

1 MR. ANTONUCCI: Okay. I'm
2 handing you Exhibit 14.
3 (Exhibit 14 was marked for identification.)

4 Q. BY MR. ANTONUCCI: Dr. Jones,
5 have you seen this before?

6 A. It certainly looks familiar,
7 yes.

8 Q. Where have you seen this
9 before?

10 A. That would appear to be a
11 poster. I believe I presented this at the
12 American Geophysical Union meeting, annual
13 meeting.

14 Q. Could you please turn to the --
15 THE VIDEOGRAPHER: Sorry, can
16 you...

17 Q. BY MR. ANTONUCCI: Could you
18 please turn to the page with the title
19 "Augmenting Sparse Groundwater Level Data
20 With Earth Observations via Machine Learning"
21 with the multiple text box -- text boxes on
22 it.

23 A. Sure.

24 Q. I believe that's the second
25 page.

1 A. Oh, okay, yeah.

2 Q. If you could look at the box
3 entitled "Data Gaps"?

4 A. Yes.

5 Q. Here this says "Monitoring
6 wells are often samples at irregular or
7 sporadic intervals. It is not uncommon for
8 monitoring wells to be abandoned, or to have
9 quite brief periods of record. We may have
10 only one or two years of information from the
11 well. How can we use machine learning to
12 best make use of what little data we have?"

13 Did I read that correctly?

14 A. Yes.

15 Q. So according to this poster,
16 one or two years of information from a well
17 is a brief period of record; right?

18 MS. BAUGHMAN: Object to the
19 form.

20 THE WITNESS: Depending on the
21 context.

22 Q. BY MR. ANTONUCCI: Okay. Are
23 you currently researching ways to address the
24 issue of sparse groundwater level data and
25 groundwater modeling by using machine

1 learning?

2 A. Yes, although I would
3 characterize it as the -- the primary
4 objective of the research we're doing here
5 with this algorithm is to help scientists and
6 water managers accurately determine how their
7 groundwater storage is changing over time so
8 that they can determine if their groundwater
9 resources are being used sustainably.

10 And one of the challenges in --
11 in generating a time history of aquifer
12 storage change is we have to work with water
13 levels measured at wells, and some wells have
14 a -- a -- a relatively complete record over a
15 long period of time.

16 Other wells have -- may go
17 years between measurements or have
18 measurements that only cover a short time
19 span. And we're exploring machine learning
20 algorithms that combine the data you do have
21 with satellite data, earth observations to --
22 to intelligently infer the missing data so
23 that you can more accurately build an aquifer
24 storage versus time curve that can be used by
25 water managers to address aquifer

1 sustainability.

2 Q. Okay. And to be totally clear,
3 machine learning is not something that was
4 applied to ATSDR's Tarawa Terrace groundwater
5 flow or transport model; right?

6 A. Not to my knowledge.

7 Q. You can put that exhibit aside.
8 Thanks, Dr. Jones.

9 A. Sure.

10 Q. Is it fair to say that a
11 modeler's goal might be to keep a model
12 simple enough to be manageable yet complex
13 enough to be useful?

14 A. That's a -- that's a common
15 expression we use, yes.

16 Q. Okay. And would you agree with
17 the phrase that one should start simple and
18 build in complexity only as needed?

19 A. Yes, in general.

20 Q. Okay. That's sort of the
21 theory underpinning model parsimony; right?

22 MS. BAUGHMAN: Object to the
23 form.

24 THE WITNESS: Yeah, that's --
25 that -- model parsimony is having the

1 right level of -- the level of
2 complexity in your model warranted by
3 the purpose of the model and what it's
4 going to be used for and the -- the
5 nature of the site that you're
6 modeling.

7 Q. BY MR. ANTONUCCI:
8 Theoretically, it's true to say that there
9 are an infinite number of combinations of
10 model parameters that will calibrate the same
11 model; right?

12 MS. BAUGHMAN: Object to the
13 form.

14 THE WITNESS: It depends on the
15 context. Not in -- there are certain
16 circumstances where that could apply,
17 but it's not true as a general
18 statement.

19 Q. BY MR. ANTONUCCI: Okay. What
20 is the problem of nonuniqueness in the
21 context of groundwater modeling?

22 A. Depending on how a model is
23 built, if -- if you have -- for example, let
24 me refer back to the -- earlier I mentioned
25 that we can use stream flow data to pin down

1 our recharge value.

2 Suppose you have an aquifer
3 where all you have are water level
4 measurements and no -- no -- no estimates on
5 discharge, and that -- that could become a
6 little more problematic in pinning down your
7 recharge value.

8 And so there are certain
9 conditions where if a -- if the conceptual
10 model is overly simplistic or your boundary
11 conditions are not well posed, you can
12 achieve a mathematical situation where, for
13 example, you could plug in any value of
14 hydraulic conductivity and get the same heads
15 out of it.

16 So it's something that modelers
17 need to be aware of. It's something that I
18 teach in my groundwater modeling class. But
19 it -- it's -- I certainly would never say
20 that for any given model there are an
21 infinite number of parameters that would
22 reasonably calibrate it.

23 Q. It is fair to say, though, that
24 multiple sets of model input parameters could
25 calibrate to a single set of observed data;

1 right?

2 MS. BAUGHMAN: Object to the
3 form.

4 THE WITNESS: I -- again, it
5 depends on the context. I wouldn't
6 say that as a general statement.

7 MR. ANTONUCCI: I'm going to
8 introduce Exhibit 15.

9 (Exhibit 15 was marked for identification.)

10 Q. BY MR. ANTONUCCI: Dr. Jones,
11 you've seen this before, haven't you?

12 A. It looks like one of my exams,
13 yes.

14 Q. Okay. I'll represent to you
15 that I pulled this off the website for your
16 groundwater modeling class.

17 Are you familiar with the
18 content of this exam?

19 A. Yes, I am.

20 Q. Okay. You've seen it before?

21 A. Yes.

22 Q. And you currently know what the
23 information on this exam is; right?

24 A. Yes.

25 Q. Okay. I'd like you to look at

1 Question 4, please.

2 A. Yes.

3 Q. It reads "(calibration) Model
4 non-uniqueness occurs when:" Answer: "b.
5 Multiple sets of model input parameters will
6 calibrate to a single set of observed data."

7 Did I read that correctly?

8 A. That's correct.

9 Q. Okay. That means there could
10 be more than one calibrated model that fits a
11 given data set; right?

12 A. You notice the way that's
13 phrased, "model uniqueness occurs when."
14 That -- basically there are certain
15 conditions, depending on how the model was
16 built, where the model can end up being
17 nonunique. That doesn't mean that all models
18 are nonunique.

19 Q. So with regard to the ATSDR
20 model, theoretically a model that sits
21 outside the uncertainty range of their model
22 could still be a good fit to the post-audit
23 data; right?

24 MS. BAUGHMAN: Object to the
25 form.

1 THE WITNESS: Say that again.

2 Q. BY MR. ANTONUCCI:

3 Theoretically, there could be a model that
4 sits outside the uncertainty range of the
5 ATSDR model that is still a good fit to the
6 post-audit data set; right?

7 MS. BAUGHMAN: Object to the
8 form.

9 THE WITNESS: I'm sorry, one
10 more time. I got to make sure I get
11 the correct answer here.

12 Q. BY MR. ANTONUCCI:

13 Theoretically, there could be a model that
14 sits outside the uncertainty range of the
15 ATSDR model that is still a good fit to the
16 post-audit data set; right?

17 MS. BAUGHMAN: Objection.
18 Form.

19 THE WITNESS: Not necessarily.

20 Q. BY MR. ANTONUCCI: Dr. Jones,
21 is a non- --

22 MS. BAUGHMAN: Wait. Were you
23 finished answering?

24 THE WITNESS: Well -- no. So
25 from my understanding of what they did

1 is they calibrated the model and got a
2 set of parameters which best fit
3 the -- the observed heads and
4 concentrations, and then in the
5 uncertainty analysis, they perturbed
6 those over a wide range of values and
7 looked at the effect on the -- on the
8 outcome, the concentrations. That
9 means they explored a broad range of
10 models.

11 Now, whether outside of that
12 range there could be models that --
13 that would adequately calibrate, I
14 can't say.

15 Q. BY MR. ANTONUCCI: Okay. Is it
16 your opinion that the post-audit calibrated
17 model is the only model that could fit the
18 data ATSDR had?

19 A. Well, the -- the post-audit was
20 not a calibration exercise.

21 Q. Excuse me. I'll re-ask my
22 question.

23 Is it your opinion that ATSDR's
24 calibrated model is the only model that could
25 fit the data ATSDR had?

1 MS. BAUGHMAN: Object to the
2 form.

3 THE WITNESS: I think it's a
4 model that reasonably and accurately
5 fits the data that they had.

6 Q. BY MR. ANTONUCCI: Is it the
7 only one that reasonably and accurately fits
8 the data they had?

9 MS. BAUGHMAN: Object to the
10 form.

11 THE WITNESS: I can't say.

12 Q. BY MR. ANTONUCCI: Why not?

13 A. I think it's an overly
14 restrictive question.

15 Q. Can you explain what would need
16 to change for you to be able to answer your
17 question?

18 MS. BAUGHMAN: Object to the
19 form.

20 THE WITNESS: Well, I would
21 need you to explain more what you
22 mean. What are the circumstances that
23 you're talking about? If you could --
24 it's a general statement. That's why
25 I'm nervous about giving a definitive

1 answer.

2 Q. BY MR. ANTONUCCI: Dr. Jones,
3 is a nonunique model a useful predictive
4 tool?

5 MS. BAUGHMAN: Object to the
6 form.

7 THE WITNESS: A model that
8 is -- it depends on the level of
9 nonuniqueness. I would say with every
10 model there's -- there's some
11 variability in the calibration, right?

12 It's not a yes-or-no question
13 whether or not a model is unique.
14 There are levels of uniqueness. In
15 fact, there are actual numerical
16 analyses that you can do to analyze
17 uniqueness.

18 When I teach the calibration
19 section of my groundwater class, we
20 use the PEST model. And one of the
21 outputs from the PEST model is a
22 number, it's a set of eigenvalues and
23 you can look at that number and
24 determine its -- it's a measure of the
25 level of uniqueness.

1 So if that number is within a
2 certain range, you say there's good
3 evidence that the model is relatively
4 unique. If it's beyond a certain
5 range, then it's evidence that there's
6 nonuniqueness at play.

7 But it's not -- that's why I'm
8 not comfortable with your question, is
9 it's not a -- it's not a black and
10 white boundary between unique and
11 nonunique models. It's a spectrum.

12 Q. BY MR. ANTONUCCI: Sure. Did
13 you evaluate the ratio of eigenvalues that
14 the calibrated model ATSDR made?

15 A. No, I did not.

16 Q. Why not?

17 A. That would have required
18 running a PEST simulation. It was -- it was
19 not within the scope of work that we were
20 asked to do.

21 Q. Okay. How can a modeler make a
22 model more unique?

23 A. More data. And it's not just
24 the amount of data, it's the types of data
25 that you have. For example, with the ATSDR

1 model, the -- they had -- from what I, in my
2 judgment, was a pretty rich data set to -- to
3 calibrate the flow model.

4 Then for the transport model,
5 you know, the initial condition was zero
6 contaminants represents, you know, one bound.
7 And on the other end they had a combination
8 of -- of water levels -- or excuse me --
9 concentrations at the wells plus the water
10 treatment data.

11 The combination of the
12 concentrations at the water treatment plant
13 plus the concentrations simulated at the
14 observation wells, in my opinion, makes the
15 model more unique.

16 Now, I would also argue that at
17 this point in time we have another 318 point
18 observations at monitoring wells at a later
19 date, which I believe the model does a --
20 does a good job of simulating; therefore,
21 providing additional evidence for the -- for
22 the accuracy and uniqueness of the model.

23 Q. Dr. Jones, you agree that it's
24 impossible to fully characterize and
25 incorporate all parameters and complexities

1 of a real aquifer system into a discretized
2 computer model; right?

3 A. Correct.

4 Q. Okay. ATSDR had no
5 site-specific data for estimating the
6 distribution coefficient; right?

7 MS. BAUGHMAN: Object to the
8 form and foundation.

9 THE WITNESS: I'm not -- I
10 don't know. Not that I'm aware of.

11 Q. BY MR. ANTONUCCI: Would
12 reviewing Chapter F help you remember?

13 A. It could.

14 Q. Okay. I'd like you to turn to
15 Page F27.

16 A. Let's see, exhibit -- I'm
17 getting a stack here.

18 Q. Chapter F is Exhibit 11.

19 A. Okay. Okay.

20 Q. Okay. I am looking at the last
21 full paragraph on Page F27, starting with the
22 word "Estimates."

23 A. Yes.

24 Q. This says "Estimates of
25 retardation factors and distribution

1 coefficients for PCE migration within the
2 Tarawa Terrace aquifer or Castle Hayne
3 aquifer are unknown, and initial estimates
4 applied to the MT3DMS model were based on
5 literature sources."

6 Did I read that correctly?

7 A. Yep.

8 Q. That help you remember whether
9 they had data for the distribution
10 coefficient?

11 A. Yes.

12 MS. BAUGHMAN: Object.

13 Q. BY MR. ANTONUCCI: Okay. Did
14 they have site-specific data to estimate the
15 distribution coefficient for the ATSDR TT
16 model?

17 A. No.

18 Q. Okay. Instead, ATSDR reviewed
19 literature sources; right?

20 A. Correct.

21 MR. ANTONUCCI: All right. I'd
22 like to take a break now.

23 THE VIDEOGRAPHER: We're off
24 the record. The time is 2:42.

25 (There was a break taken.)

1 THE VIDEOGRAPHER: We're back
2 on the record. The time is 2:56.
3 This is Media Number 4.

4 Counsel may proceed.

5 Q. BY MR. ANTONUCCI: Dr. Jones,
6 what is your understanding of how the data
7 from ATSDR's Tarawa Terrace model was to be
8 used?

9 MS. BAUGHMAN: Objection.
10 Form. Foundation.

11 THE WITNESS: So are we through
12 with this discussion on the --

13 MR. ANTONUCCI: Yep, you can
14 put that to the side.

15 THE WITNESS: Okay. All right.

16 MR. ANTONUCCI: I'll ask again.

17 Q. What is your understanding of
18 how the data from ATSDR's Tarawa Terrace
19 model was to be used?

20 MS. BAUGHMAN: Objection. Form
21 and foundation.

22 THE WITNESS: From my
23 understanding, the primary objective
24 was to do a historical reconstruction
25 of the PCE concentrations at the

1 Tarawa Terrace water treatment plant
2 between 1953 and when the plant was
3 shut down.

4 Q. BY MR. ANTONUCCI: Okay. I'd
5 ask that you turn to Exhibit 9. That's TT
6 Chapter A Page A1.

7 A. Exhibit 2?

8 Q. Exhibit 9.

9 A. Did you say Chapter A?

10 Q. Yes. Exhibit 9 is also a copy
11 of Chapter A.

12 A. I'm sorry. Let me grab your
13 copy. What page again?

14 Q. A1. That's the page ending in
15 Bates Number 615652.

16 A. Okay.

17 Q. All right. In the column
18 underneath the word "Abstract," I'm reading
19 the third sentence starting with the word
20 "Because."

21 "Because scientific data
22 related to the harmful effects of VOCs on a
23 child or fetus are limited, the Agency for
24 Toxic Substances and Disease Registry
25 (ATSDR), an agency of the U.S. Department of

1 Health and Human Services, is conducting an
2 epidemiological study to evaluate potential
3 associations between in utero and infant (up
4 to one year of age) exposures to VOCs in
5 contaminated drinking water at Camp Lejeune
6 and specific birth defects and childhood
7 cancers. The study includes births occurring
8 during the period 1968 to 1985 to women who
9 are pregnant while they resided in family
10 housing at Camp Lejeune. Because limited
11 measurements of contaminant and exposure data
12 are available to support the epidemiological
13 study, ATSDR is using modeling techniques to
14 reconstruct historical conditions of
15 groundwater flow, contaminant fate and
16 transport, and the distribution of drinking
17 water contaminated with VOCs delivered to
18 family housing areas."

19 Did I read that correctly?

20 A. Yes.

21 Q. Please turn to Page A98. That
22 page ends in Page Number 615749.

23 A. Okay.

24 Q. All right. I am looking at the
25 last paragraph on this page. It looks like

1 it's a question and answer section. Here the
2 question reads "ATSDR's historical
3 reconstruction analysis documents that Tarawa
4 Terrace drinking water was contaminated with
5 PCE that exceeded the current maximum
6 contaminant level (MCL) of 5 micrograms per
7 liter during 1957 and reached a maximum value
8 of 183 micrograms per liter. What does this
9 mean in terms of my family's health?"

10 Did I read that correctly?

11 A. Oh, hang on, I was looking at
12 the wrong paragraph.

13 MS. BAUGHMAN: Where -- just
14 tell him -- where are you reading
15 from?

16 THE WITNESS: The blue
17 paragraph on the left. I think you
18 might be on the wrong page. It's A98.

19 MS. BAUGHMAN: I thought he
20 said 97, okay.

21 THE WITNESS: Okay, yes, I -- I
22 believe you read that correctly.

23 Q. BY MR. ANTONUCCI: Okay. Now
24 I'm looking at the paragraph in black text on
25 the right next to what I just read.

1 Do you see that?

2 A. Yeah.

3 Q. It reads "ATSDR's exposure
4 assessment cannot be used to determine
5 whether you, or your family, suffered any
6 health effects as a result of past exposure
7 to PCE-contaminated drinking water at Camp
8 Lejeune."

9 Did I read that correctly?

10 A. Yes.

11 Q. It goes on to say "The study
12 will help determine if there is an
13 association between certain births defects
14 and childhood cancers among children whose
15 mothers used this water during pregnancy."

16 Did I read that correctly?

17 A. Yes.

18 MR. ANTONUCCI: Okay. I am now
19 going to hand you what will be marked
20 for identification as Exhibit 16.

21 (Exhibit 16 was marked for identification.)

22 Q. BY MR. ANTONUCCI: Okay. For
23 the record, Exhibit 16 has the Bates range
24 CLJA_WATERMODELING_01-09_0000033263 through
25 33326.

1 Dr. Jones, this document has
 2 the title "Analyses of Groundwater Flow,
 3 Contaminant Fate and Transport, and
 4 Distribution of Drinking Water at Tarawa
 5 Terrace and Vicinity, U.S. Marine Corps Base
 6 Camp Lejeune, North Carolina: Historical
 7 Reconstruction and Present-Day Conditions
 8 Response to the Department of the Navy's
 9 letter on: Assessment of ATSDR Water Modeling
 10 for Tarawa Terrace."

11 Dr. Jones, have you seen this
 12 before?

13 A. Yes, I have.

14 Q. Okay. I'm going to ask you to
 15 turn to the page ending in Bates
 16 Number 33272.

17 A. Okay.

18 Q. All right. Looking at the last
 19 full paragraph on that page, this says "To
 20 address the issue of the intended use of the
 21 water-modeling results by the current ATSDR
 22 epidemiological study" --

23 A. Excuse me, I think I might be
 24 on the wrong page. What -- what was the page
 25 number? Is it 33272?

1 Q. Yes, sir.

2 A. And which paragraph are you --
3 oh, the last paragraph. Okay, I gotcha.

4 Q. So the last paragraph on
5 Page 33272 of Exhibit 16 states "To address
6 the issue of the intended use of
7 water-modeling results by the current ATSDR
8 epidemiological study, the DON should be
9 advised that a successful epidemiological
10 study places little emphasis on the actual
11 (absolute) estimate of concentration and,
12 rather, emphasizes the relative level of
13 exposure. That is, exposed individuals are,
14 in effect, ranked by exposure level and
15 maintain their rank order of exposure level
16 regardless of how far off the estimated
17 concentration is to be 'true' (measured) PCE
18 concentration."

19 Did I read that correctly?

20 A. Yes.

21 Q. Okay. So, Dr. Jones, the
22 paragraph I just read states that a
23 successful epidemiological study places
24 little emphasis on the actual absolute
25 estimates of concentration; right?

1 A. Yes.

2 Q. Okay. In your report you opine
3 that the model remains a reliable tool for
4 understanding general trends of contaminant
5 migration in the Tarawa Terrace region, and
6 that you can find no significant evidence
7 that would invalidate the analysis performed
8 by ATSDR with the original model; right?

9 A. Correct.

10 Q. However, you're not offering an
11 opinion that the Tarawa Terrace model is a
12 sufficiently reliable model for determining
13 quantitative levels of contaminant exposure
14 for an individual; right?

15 MS. BAUGHMAN: Object to the
16 form. Foundation. Outside the scope.

17 THE WITNESS: I am not an
18 expert in epidemiology, so I don't
19 feel qualified to render an opinion on
20 that question.

21 Q. BY MR. ANTONUCCI: Okay. So
22 you're not offering the opinion that the
23 Tarawa Terrace model can be used to determine
24 quantitative levels of contaminant exposure
25 for individuals?

1 MS. BAUGHMAN: Object to the
2 form.

3 THE WITNESS: I don't believe
4 I've -- again, my answer's the same.
5 I'm not an epidemiological expert so I
6 can't comment on that.

7 Q. BY MR. ANTONUCCI: Can I have a
8 yes or a no?

9 MS. BAUGHMAN: No -- objection.
10 You do not have to answer yes
11 or no.

12 Q. BY MR. ANTONUCCI: Are you
13 offering the opinion or not?

14 MS. BAUGHMAN: Object to the
15 form. Asked and answered.

16 THE WITNESS: Could you restate
17 the question.

18 Q. BY MR. ANTONUCCI: You're not
19 offering the opinion that the Tarawa Terrace
20 model is a sufficiently reliable model for
21 determining quantitative levels of
22 contaminant exposure for an individual;
23 right?

24 MS. BAUGHMAN: Objection; form.
25 Objection; Foundation.

1 THE WITNESS: The -- the
2 opinions we've rendered on the model
3 was that in terms of the -- how the
4 model simulates concentrations at the
5 water treatment plant, it -- it is a
6 reasonably accurate model developed
7 using sound scientific and engineering
8 principles.

9 How that -- concentrations
10 resulting from that are then
11 incorporated in an epidemiological
12 study is outside my scope of
13 expertise -- expertise.

14 Q. BY MR. ANTONUCCI: So that is
15 not an opinion you're offering?

16 MS. BAUGHMAN: Objection.
17 Form.

18 THE WITNESS: No, that's not an
19 opinion I'm offering.

20 Q. BY MR. ANTONUCCI: Had you done
21 a post-audit prior to the Tarawa Terrace
22 post-audit?

23 MS. BAUGHMAN: Objection to
24 form.

25 THE WITNESS: In the sense of

1 running a model simulation and
2 comparing its output to field observed
3 values, I have done that countless
4 times.

5 Q. BY MR. ANTONUCCI: You just
6 described calibration, didn't you?

7 A. In a -- no. Calibration is
8 when you then take the results of that and go
9 back and change the input parameters.

10 But I would say what I just
11 described is a subset of what you do for
12 calibration. But simply comparing model
13 outputs to field observed values is -- is a
14 really simple and very common thing that I've
15 done countless times.

16 Q. Have you ever published a
17 post-audit before?

18 A. No.

19 Q. How long did it take you to
20 perform the Tarawa Terrace post-audit?

21 A. The initial post-audit we
22 started in, I believe, early September and
23 submitted it in late October of 2024.

24 Q. So roughly a month?

25 MS. BAUGHMAN: Objection to

1 form.

2 THE WITNESS: A little over a
3 month.

4 Q. BY MR. ANTONUCCI: And you did
5 both a qualitative and quantitative
6 assessment as part of your post-audit; is
7 that right?

8 A. That's correct.

9 Q. Are quantitative and
10 qualitative assessments terms of art applied
11 to post-audits?

12 A. Excuse me? Terms of art?

13 Q. Are those -- do those terms
14 have any special significance in the modeling
15 community?

16 A. Yeah, I would say it's a
17 relatively standard practice. For example,
18 one of the most common ways to assess the --
19 the results of a model calibration is to
20 visually examine a simulated versus observed
21 plot and see how close the points plot to
22 the -- to the -- the line of agreement, which
23 is what I would call a qualitative assessment
24 of the goodness of fit.

25 Q. Okay. There are also

1 quantitative assessment of goods of fit;
2 right?

3 A. Yes.

4 Q. That would include summary
5 statistics like mean error and mean absolute
6 error; right?

7 A. And -- yes, and geometric bias
8 is one of those, yes.

9 Q. Okay. I'd like to discuss
10 those error metrics in more detail, but first
11 you issued two reports in this case; right?

12 A. Correct.

13 Q. One was an initial report and
14 the other was a rebuttal; right?

15 A. Yes.

16 Q. In your rebuttal report you
17 corrected errors highlighted by
18 Dr. Spiliotopoulos in his expert report;
19 right?

20 A. Yes.

21 Q. That included truncation
22 errors, incorrect mass loading end date, and
23 an incorrect pumping rate for well RWC2;
24 right?

25 A. That's correct.

1 Q. After Dr. Spiliotopoulos
2 identified errors in your post-audit, did you
3 go back and confirm that the rest of the
4 post-audit had been done correctly?

5 A. We had -- I'm not aware of any
6 other reason to believe there were errors in
7 the initial post-audit.

8 Q. After Dr. Spiliotopoulos
9 identified errors, did you go back and check
10 for any others?

11 A. No.

12 Q. So you only corrected errors
13 that Dr. Spiliotopoulos pointed out?

14 A. That's correct.

15 Q. Are you aware of any other
16 model input errors in your post-audit?

17 A. No.

18 Q. Are you now confident that
19 you've found and resolved all model input
20 errors in your post-audit?

21 A. I believe so.

22 Q. Could there be more model input
23 errors in your post-audit?

24 MS. BAUGHMAN: Objection.

25 Form.

1 THE WITNESS: It's possible.

2 Q. BY MR. ANTONUCCI: Okay.

3 Please turn to your initial report, that's
4 Exhibit 6. Page 5-1.

5 A. Okay.

6 Q. All right. Are you looking at
7 the page that has the heading "Results"?

8 A. Oh, sorry. 5-1 did you say?

9 Q. Yes.

10 A. I have it now.

11 Q. Okay. I'm looking at the last
12 sentence of the first paragraph. It reads
13 "Before presenting the results, it is helpful
14 to remember that when simulating the
15 migration of a PCE contaminant plume using
16 MODFLOW and MT3DMS, achieving a close match
17 between simulated and observed concentrations
18 can be challenging for several reasons."

19 Did I read that correctly?

20 A. That's correct. And what I
21 was talk- -- what we were talking about in
22 this case is looking at individual observed
23 concentrations and expectations regarding how
24 well the model will reproduce those
25 concentrations in the simulation on a

1 point-by-point basis.

2 Q. Okay. With all due respect,
3 Dr. Jones, my question was did I read that
4 correctly. I need you to limit your answers
5 to my questions, okay?

6 A. Sorry. Will do.

7 Q. Thank you.

8 You go on to list reasons why
9 it's helpful to remember that achieving a
10 close match between simulated and observed
11 concentrations can be challenging; right?

12 A. Correct.

13 Q. Those four reasons include
14 complex subsurface conditions, temporal
15 variability, limitations in model resolution,
16 and measurement variability; right?

17 A. Correct.

18 Q. Okay. Under the subheading
19 "Complex Subsurface Conditions," that's
20 Number 1.

21 A. Yes.

22 Q. You wrote that "The subsurface
23 environment is inherently complex, with
24 variations in soil heterogeneity,
25 permeability, porosity, and hydraulic

1 conductivity. These properties vary
2 spatially in ways that are not fully captured
3 in the model, affecting how the contaminant
4 plume moves through the groundwater system."

5 Did I read that correctly?

6 A. That's correct.

7 Q. Next Number 2, "Temporal
8 Variability," you wrote "The concentration of
9 contaminants can change over time due to
10 factors like seasonal variations in
11 groundwater flow, biodegradation, chemical
12 reactions. Simulating these dynamic
13 processes accurately over the entire
14 simulation period is challenging."

15 Is that correct?

16 A. Correct.

17 Q. Okay. Number 3 says
18 "Limitations in Model Resolution: MODFLOW
19 and MT3DMS rely on discretizing the
20 subsurface into numerical grids consisting of
21 cells that represent a subset of the aquifer.
22 The resolution of these grids can limit the
23 model's ability to capture fine-scale
24 variations in plume behavior, particularly in
25 areas with sharp concentration gradients,

1 small-scale heterogeneities, or preferential
2 pathways."

3 Did I read that correctly?

4 A. Yes.

5 Q. Number 4 says "Measurement
6 Variability: The observed concentrations at
7 observation wells may contain some degree of
8 measurement error or uncertainty. Field data
9 collection is subject to variability, which
10 adds another layer of complexity with trying
11 to match it closely with model outputs. As
12 outlined above in Section 4.2, extreme
13 variations were observed in some of the
14 measured concentrations used in this
15 post-audit."

16 Did I read that correctly?

17 A. Yes.

18 Q. Okay. I'd like for you to turn
19 to your rebuttal report, Page 3-12. That's
20 going to be Exhibit 7.

21 A. What was the page again?

22 Q. 3-12.

23 A. 3-12. Okay.

24 Q. Okay. Dr. Jones, the second
25 paragraph on this page reads "We have also

1 generated new versions of each of the tables
2 and figures from our original post-audit"
3 reporting -- "report featuring simulated PCE
4 values, using the updated post-audit
5 simulation results, processed at full
6 precision. These results are presented in
7 Appendix A. The differences in the tables
8 and figures relative to the original report
9 are relatively minor overall. The
10 differences are summarized as follows:"

11 Did I read that correctly?

12 A. Yes.

13 Q. Dr. Jones, this section says
14 that the differences between the corrections
15 you made to your post-audit are relatively
16 minor overall; is that right?

17 A. That's correct.

18 Q. Okay. And the table below that
19 paragraph summarizes the list of changes to
20 the tables and figures of your report; is
21 that right?

22 A. That's correct.

23 Q. Okay. I'd like you to turn
24 back to your original report, Page vi, six in
25 Roman numerals. Again, your original report

1 is going to be Exhibit 6.

2 A. Okay.

3 Q. Are you looking at the
4 Executive Summary?

5 A. Yes.

6 Q. All right. I am looking at the
7 third paragraph from the bottom beginning
8 with the sentence -- the phrase "The
9 extended."

10 Do you see where I am?

11 A. Yes.

12 Q. This reads "The extended MT3DMS
13 model was found to perform well in simulating
14 PCE concentrations at monitoring wells across
15 the study area. The errors are remarkably
16 well balanced, indicating a good overall fit
17 between simulated and observed
18 concentrations."

19 Did I read that correctly?

20 A. Yes.

21 Q. Now, Dr. Jones, for the
22 purposes of evaluating fit between simulated
23 and observed concentrations you provided some
24 summary statistics; is that right?

25 A. Correct.

1 Q. Okay. What is residual error?

2 A. At a particular observation
3 well location it's the difference between the
4 model simulated concentration and the
5 observed concentration.

6 And the way we calculated it,
7 we took the simulated value minus the
8 observed value.

9 So if the model overestimates
10 the concentration, it would be a positive
11 residual error; if the model underestimated
12 the concentration, it would represent a
13 negative residual error.

14 Q. Okay. The mean error is the
15 average of the residual errors; right?

16 A. That's correct.

17 Q. And mean absolute error is the
18 average of the absolute value of the
19 residuals?

20 A. That's correct.

21 Q. The mean error of the initial
22 post-audit was 21 micrograms per liter;
23 correct?

24 A. That's correct.

25 Q. The mean absolute error of your

1 initial post-audit was 334 micrograms per
2 liter; correct?

3 A. That's correct.

4 Q. Dr. Jones, a negative mean
5 error indicates that a model under predicts
6 observed values; correct?

7 A. That's correct.

8 Q. A positive mean error indicates
9 that a model over predicts observed values;
10 correct?

11 A. Correct, on average.

12 Q. Mean absolute error is also a
13 metric that's used to evaluate overall fit
14 between simulated and observed
15 concentrations; correct?

16 A. It's -- it's a different
17 statistical measure used to fit -- to analyze
18 the calibration results, yes.

19 Q. Okay. And the mean absolute
20 error cannot be negative; right?

21 A. That's correct.

22 Q. For your updated post-audit,
23 the mean error was 48 micrograms per liter;
24 right?

25 A. Yes.

1 Q. That's an increase of
2 27 micrograms per liter from the original
3 post-audit results?

4 A. That's correct.

5 Q. Did you calculate the mean
6 absolute error for the updated post-audit?

7 A. I don't recall.

8 Q. Your groundwater modeling
9 software, GMS, provides the summary
10 statistics automatically, doesn't it?

11 A. Yes. But to calculate these
12 errors, we typically just took the -- the
13 simulated versus observed PCE concentrations
14 as shown, for example, in Table A1 of the
15 rebuttal report and did the error analysis
16 using Excel, Microsoft Excel. It's a very
17 simple equation.

18 Q. Okay. So you -- you did that
19 very simple equation for the initial report
20 but not the rebuttal report; is that right?

21 A. Well, I'm sure I have a
22 spreadsheet with that number in it. Whether
23 that number was reported in the rebuttal
24 report, I don't recall.

25 I would expect that number to

1 be roughly similar to the -- to the value
2 reported in the initial report, certainly
3 along the same scale, which is relatively
4 large considering a large -- indicating a
5 large variability in the PCE concentrations.

6 Q. But sitting here today, you do
7 not know the mean absolute error of your
8 updated -- or your rebuttal post-audit?

9 A. That's correct. I couldn't
10 tell it off the top of my head.

11 Q. Okay. Earlier you mentioned
12 geometric model bias as another summary
13 statistic that could be used to evaluated fit
14 between simulated and observed
15 concentrations; is that right?

16 A. That is correct.

17 Q. When a ratio of simulated PCE
18 concentrations is simulated to observed PCE
19 concentrations is less than one, that
20 indicates under-prediction by the model;
21 correct?

22 A. That's correct.

23 Q. And when the ratio of simulated
24 PCE concentration to observed PCE
25 concentrations equals one, that indicates

1 exact agreement; correct?

2 A. That's correct.

3 Q. When the ratio of simulated PCE
4 concentrations to observed PCE concentrations
5 is greater than one, that indicates
6 over-prediction by the model; correct?

7 A. Correct.

8 Q. The further the geometric model
9 bias is from a value of one, the worse the
10 agreement between simulated and observed
11 concentrations; correct?

12 A. That's correct.

13 Q. Okay. I would like to direct
14 your attention to Exhibit 9, Page A26. And
15 Exhibit 9 is the Tarawa Terrace Chapter A
16 report.

17 A. Okay. A26, got it.

18 Q. All right. Do you see Table A8
19 at the top of the page?

20 A. Yes.

21 Q. Okay. In the one, two -- third
22 column from the top, in the -- excuse me --
23 third row from the top in the Resulting
24 Calibration Statistics column, geometric
25 model bias is indicated as being equal to 5.8

1 backslash or 3.9.

2 Do you see that?

3 A. Yes.

4 Q. Okay. ATSDR calculated two
5 geometric model biases for the Tarawa Terrace
6 calibrated model; correct?

7 A. That's correct.

8 Q. One was the geometric model
9 bias that used data for TT-23; is that right?

10 A. Yes.

11 Q. And that was the 5.9 value?

12 A. 5.8. It says 5.8 in this
13 table.

14 Q. It does.

15 If you turn to Page A25. At
16 the top of the right-hand column I'm reading
17 the sentence that says "The inclusive
18 geometric model bias, using data for
19 water-supply Well TT-23, was 5.9."

20 A. Okay.

21 Q. See that?

22 A. Sure.

23 Q. "The selected geometric model
24 bias, omitting data for supply Well TT-23 was
25 3.9."

1 A. Yes.

2 Q. "Both results, however,
3 indicate over-prediction by the model."
4 Did I read that correctly?

5 A. Yes.

6 Q. Dr. Jones, I would like you to
7 turn to Exhibit 7, that's your rebuttal
8 report, Figure A2.

9 A. Yes.

10 Q. Okay. And here we're looking
11 at a graph. On the Y axis we have simulated
12 PCE concentrations in micrograms per liter,
13 the X axis we have observed PCE
14 concentrations in micrograms per liter;
15 right?

16 A. That's correct.

17 Q. That dashed line in the middle
18 is where the simulated and observed
19 concentrations are equal; right?

20 A. That's correct.

21 Q. Okay. Earlier you indicated
22 that a scatter plot like this one can be used
23 for a qualitative assessment of the goodness
24 of fit of a model; is that right?

25 A. Yes.

1 Q. And that's because you can
2 visually examine how far the points are from
3 the one to one line; is that right?

4 A. Yes, and also the clustering
5 and -- and distribution.

6 Q. Okay. Please turn to Figure 5
7 of your rebuttal report. And that's
8 Exhibit 7.

9 A. Okay.

10 Q. This figure shows the graph
11 that we were just looking at on the
12 right-hand side of the page; is that right?

13 A. Yes.

14 Q. And it shows a similar plot
15 from your initial report on the left-hand
16 side of the page; right?

17 A. Correct.

18 Q. In your rebuttal report you
19 state that while the numbers indicate a high
20 degree of variance, they're visually more
21 balanced than the results we originally
22 presented in the post-audit report; right?

23 A. Correct.

24 Q. Quantitatively the updated
25 post-audit indicates a small increase in the

1 bias compared to the initial post-audit;
2 right?

3 A. Say that again.

4 MS. BAUGHMAN: Object to the
5 form.

6 Q. BY MR. ANTONUCCI: The updated
7 post-audit indicates a small increase in the
8 bias compared to the initial post-audit?

9 A. Based on the mean error, yes.

10 Q. I'd like you to turn to
11 Page 3-5 of your rebuttal report. I am
12 looking at the one, two -- third paragraph
13 from the top of the page beginning with "In
14 Section 3.1.2."

15 Do you see where I am?

16 A. Yes.

17 Q. All right. About halfway down
18 the paragraph a sentence starts with "For the
19 original post-audit."

20 Do you see that?

21 A. Yes.

22 Q. "For the original post-audit
23 results we calculated a mean error value
24 equal to 21 micrograms per liter, indicating
25 an extremely balanced fit with only a small

1 high bias. For the updated post-audit
2 results, the mean error equals 48 micrograms
3 per liter, indicating a small increase in the
4 bias, but still relatively well balanced
5 overall."

6 Is that correct?

7 A. That's correct. When you --
8 when you asked that before, I thought maybe
9 you were talking of the post-audit versus the
10 original report, so I apologize for the
11 misunderstanding. Excuse me, versus the
12 original model.

13 Q. Please turn to Table A2 in your
14 rebuttal report. Again, that's Exhibit 7.

15 MS. BAUGHMAN: What page did
16 you say?

17 MR. ANTONUCCI: Table A2.

18 Q. Are you looking at Table A2,
19 Dr. Jones?

20 A. Yes.

21 Q. Okay. So this table shows the
22 monitoring wells, the layer in the model
23 where the well is screened, mean error, mean
24 absolute error, and the mean absolute error
25 category; correct?

1 A. That's correct.

2 Q. Okay. Earlier you indicated
3 that the mean absolute error is the absolute
4 value of the mean error; correct?

5 A. No. It's the -- well, yes, you
6 can calculate it that way, sure.

7 Q. Okay. I'd like you to take a
8 look at Well C3.

9 A. Okay.

10 Q. Here the mean error is
11 indicated as being 98 micrograms per liter
12 and the mean absolute error is indicated as
13 being 124.5 micrograms per liter.

14 Do you see that?

15 A. Yes.

16 Q. Why are those numbers
17 different?

18 A. That is a great question. I'm
19 not sure.

20 Q. I'd like you to look at
21 Well C9. Here the mean error is negative
22 5.9 micrograms per liter, the mean absolute
23 error is 6 micrograms per liter.

24 A. Yes.

25 Q. Why are those numbers

1 different?

2 A. Because they're displayed using
3 different significant figures.

4 Q. Okay. I'd like you to look at
5 Well C13.

6 A. Okay.

7 Q. Here the mean error is negative
8 555 micrograms per liter, the mean absolute
9 error is 563.7 micrograms per liter.

10 A. Yes.

11 Q. Why are those numbers
12 different?

13 A. I'm not sure.

14 Q. Okay. Look at Well C17-D.
15 Here the mean error is negative 0.2, the mean
16 absolute error is 0.4.

17 Why are those numbers
18 different?

19 A. I'm not sure.

20 Q. Okay. If you look at
21 Well RWC-1, the mean error is 251.9, the mean
22 absolute error is 252.6; right?

23 A. Correct.

24 Q. Why are those numbers
25 different?

1 A. I'm not sure.

2 Q. If you look at Well RWS-3A, the
3 mean error is negative 83.8; correct?

4 A. Yes.

5 Q. The mean absolute error is
6 136.4; right?

7 A. Correct.

8 Q. Why are those numbers
9 different?

10 A. The -- well, you -- when you
11 calculate the mean error, you calculate the
12 average of all of the individual errors. To
13 calculate the mean absolute error, you don't
14 simply take the absolute value of that
15 number.

16 What you do is you take the
17 absolute value of the individual residuals
18 one by one and then calculate the mean of
19 those values. And I suspect the reason there
20 are some differences here is because of that
21 difference in how they're calculated. It is
22 not simply taking the absolute value of the
23 mean error.

24 Q. Okay. You did say that
25 earlier, though; right?

1 A. Excuse me?

2 Q. You said that the mean absolute
3 error is the absolute value of the mean
4 error?

5 A. Yes, but on an individual
6 basis. And so I'm -- I -- if -- if I stated
7 that misleadingly, then I'm correcting that
8 now.

9 Q. Okay. Why don't you take a
10 look at Well S2.

11 MS. BAUGHMAN: Were you -- were
12 you finished with your answer, Norm?

13 THE WITNESS: Yeah, I think so.

14 MS. BAUGHMAN: Okay.

15 Q. BY MR. ANTONUCCI: All right.
16 Well S2.

17 A. Uh-huh.

18 Q. Mean error negative 73.8.

19 A. Yes.

20 Q. Mean absolute error 111.6.

21 A. Right.

22 Q. Is that a rounding error?

23 A. No. These -- these are not --
24 these should not be expected to agree. And
25 let me explain why.

1 Suppose you had a circumstance
2 where you had a number of positive residual
3 errors and a number of negative residual
4 errors, but somehow they -- they balanced,
5 right?

6 They -- they -- let's say you
7 had a negative ten, a negative five, and a
8 positive ten and a positive five. If you
9 took the mean of those errors, that would
10 equal zero indicating a perfect balance.

11 But if you first took the
12 absolute value of those numbers and then took
13 the average of that, you'd be averaging ten,
14 five, ten, and five. And the mean of that
15 would be 7.5.

16 So, no, the mean absolute error
17 is not simply the absolute value of the mean
18 error.

19 Q. Okay. When you report the mean
20 absolute error in your -- when you reported
21 that in your initial report, which method of
22 calculating did you use?

23 A. What I just described. You
24 take the absolute value of the individual
25 residuals, and then calculate the average of

1 that. There are circumstances under which
2 your mean error will match the mean absolute
3 error.

4 For example, if all of your
5 errors are negative or if all of your errors
6 are positive, then your mean error and your
7 mean absolute error will match, and that's
8 why it matches in some of these cases but not
9 others.

10 Q. Okay. Okay. Another point of
11 clarification that I'd appreciate, if you
12 look at Table 1 of your initial report, and
13 that's going to be Exhibit 6.

14 A. Okay.

15 Q. This table shows various
16 publicly available rainfall data; is that
17 right?

18 A. Yes.

19 Q. Okay. And it shows publicly
20 available rainfall data from 1995 to 2009;
21 right?

22 A. Correct.

23 Q. At the Wilmington Airport,
24 Wilmington 7N, and New River MCAF stations;
25 is that right?

1 A. That's correct.

2 Q. Okay. Okay, I am going to mark
3 for identification Exhibit 17.
4 (Exhibit 17 was marked for identification.)

5 MR. ANTONUCCI: For the record,
6 this is the native spreadsheet version
7 of the document produced with Bates
8 Number CL_PLG --

9 MS. BAUGHMAN: Sorry, did you
10 give me one? I don't have one.

11 MR. ANTONUCCI: Dash
12 EXPERT_DAVIS_0000000203.XL -- excuse
13 me -- 203. That's the end of the
14 Bates number.

15 Q. Dr. Jones, are you familiar
16 with this?

17 A. It looks familiar.

18 Q. This is the rainfall data you
19 used to calculate the effective rainfall
20 recharge rate for the post-audit; right?

21 A. I believe so.

22 Q. Okay. Can you please look at
23 the year 1999.

24 A. Uh-huh.

25 Q. Is there data available there?

1 A. No.

2 Q. Okay. Can you look back at
3 Table 1 in your initial report.

4 A. Yes.

5 Q. Will you please look at the
6 year 1999.

7 A. Yes.

8 Q. Is there data available there?

9 A. Yes.

10 Q. For New River MCAF?

11 A. Yes.

12 Q. Can you explain the
13 discrepancy, please.

14 A. I cannot.

15 Q. Okay. How about the year 2000?
16 Can you look at the year 2000 on the
17 spreadsheet that you produced?

18 A. Yes.

19 Q. Is there data available there?

20 A. No.

21 Q. Okay. Can you look at the year
22 2000 on Table 1 of your initial report.

23 A. Yes.

24 Q. In the New River MCAF column,
25 is there a value there?

1 A. No -- or excuse me -- yes.

2 Q. It's 50.4; right?

3 A. That's correct.

4 Q. Inches per year?

5 A. Correct.

6 Q. Where did you get that data
7 from?

8 A. I -- I'm not sure why there's a
9 discrepancy here.

10 Q. Okay.

11 A. I'd have to investigate it.

12 MR. ANTONUCCI: I'd like to
13 take another break.

14 THE VIDEOGRAPHER: We're off
15 the record. The time is 3:47.

16 (There was a break taken.)

17 THE VIDEOGRAPHER: We're back
18 on the record. The time is 4:06.

19 Q. BY MR. ANTONUCCI: Dr. Jones,
20 you stated in your initial report that larger
21 errors tend to be concentrated in the center
22 of the plume where the simulated
23 concentrations are greater; is that right?

24 A. Yes.

25 Q. You also said that that's

1 somewhat expected because comparing larger
2 numbers organically results in larger
3 differences; right?

4 A. Yes.

5 Q. Concentrations are generally
6 higher in the center of a plume; right?

7 A. Yes.

8 Q. Could you please turn your
9 attention to Rebuttal Figure A9. That's
10 going to be Exhibit 7.

11 A. Okay.

12 Q. Please look at the center pane
13 of this figure, Model Layer 3. Are you
14 looking there?

15 A. Yes.

16 Q. Do you see model -- excuse
17 me -- do you see Well C5, the plot for
18 Well C5?

19 A. Yes.

20 Q. And that is within the
21 simulated PCE plume; right?

22 A. Correct.

23 Q. And it's in the portion of the
24 simulated PCE plume where concentrations are
25 greater than 500 to 5,000 micrograms per

1 liter; right?

2 A. That's correct.

3 Q. Okay. That's the center of the
4 plume; right?

5 A. Yes.

6 Q. I'd like you to turn to
7 Rebuttal Table A1.

8 A. Okay.

9 Q. And if you could please look at
10 the first two pages of Table A1 in Exhibit 7.

11 A. Which page number?

12 Q. So Page 1. The page number is
13 Page 1 of 7.

14 A. Okay.

15 Q. And...

16 A. I got it.

17 Q. All right. If you look towards
18 the bottom of Page 1 of 7, Table A1?

19 A. Yes.

20 Q. Well C5 is the last four rows
21 of this table; right?

22 A. Yes.

23 Q. And this shows observed versus
24 simulated concentrations with the error rate
25 and the absolute error rate; correct?

1 A. That's correct.

2 Q. All of the observed PCE
3 concentrations for Well C5 are below the
4 detection limit; isn't that right?

5 A. That's correct.

6 Q. Okay. And then continuing on
7 to Page 2 of Table A1, we're still looking at
8 Well C5. That's going to be the first seven
9 rows of this table?

10 A. Yes.

11 Q. All of the PCE observed
12 concentrations were below the detection limit
13 here as well; right?

14 A. That's correct.

15 Q. The calibrated model and the
16 post-audit both simulated high PCE
17 concentrations at that well, didn't they?

18 A. Yes.

19 Q. Still in Exhibit 7, your
20 rebuttal report, I'd like you to turn to
21 Page 3-13.

22 A. Okay.

23 Q. All right. Under Section 3.7,
24 Opinion 6 - Post-Audit Robustness. I am
25 looking at the second full paragraph.

1 Do you see that?

2 A. Yes.

3 Q. Okay. The last sentences of
4 that paragraph reads "These findings support
5 our original conclusion that the ATSDR model
6 was developed using a methodology that is
7 scientifically sound and accepted within the
8 scientific community, and it remains a
9 reliable tool for assessing the impacts of
10 PCE contamination at Tarawa Terrace."

11 Did I read that correctly?

12 A. Yes.

13 Q. Okay. Dr. Jones, in the
14 post-audit you used the model input
15 parameters that were provided to you by the
16 legal team; right?

17 A. Yes.

18 Q. And you did not independently
19 evaluate the suitability of those parameters;
20 correct?

21 A. The -- the parameters in the --
22 you mean as part of the post-audit? Can you
23 restate the question, I'm sorry.

24 Q. You did not evaluate the
25 appropriateness of the model input

1 parameters; correct?

2 MS. BAUGHMAN: Objection.

3 Form.

4 THE WITNESS: I wouldn't say
5 that.

6 Q. BY MR. ANTONUCCI: You used the
7 model input parameters that were provided to
8 you by the legal team; right?

9 MS. BAUGHMAN: Objection.

10 Form.

11 THE WITNESS: Yes, we did.

12 Q. BY MR. ANTONUCCI: Okay.

13 Dr. Jones, earlier in the deposition you
14 mentioned that you were present via Zoom for
15 the deposition of Mr. Davis yesterday; is
16 that correct?

17 A. That's correct.

18 Q. You mentioned that you weren't
19 present for the entire deposition; is that
20 right?

21 A. That's right.

22 Q. At what times were you watching
23 the deposition?

24 A. From about 9:00 to 9:25 a.m.,
25 and then I jumped on again about 10:50 a.m.

1 and watched the remainder of the deposition.

2 Q. Do you disagree with any of the
3 opinions that Dr. Jones expressed in his
4 deposition -- excuse me -- that Mr. Davis
5 expressed in his deposition?

6 MS. BAUGHMAN: Objection.

7 Form.

8 THE WITNESS: I -- I'm not
9 going to say that everything he said
10 was precise or exactly the way I would
11 have said it, but the general
12 statements he gave, I -- I think I
13 would agree with that.

14 Q. BY MR. ANTONUCCI: Were any of
15 the statements that Mr. Davis gave incorrect?

16 MS. BAUGHMAN: Objection.

17 Form.

18 THE WITNESS: I'm not prepared
19 to cite specific examples.

20 Q. BY MR. ANTONUCCI: Can you
21 think of a single instance where Mr. Davis
22 made an incorrect statement in his
23 deposition?

24 MS. BAUGHMAN: Objection.

25 Form.

1 THE WITNESS: Nothing
2 substantive.

3 Q. BY MR. ANTONUCCI: Can you
4 think of any non-substantive errors in
5 Mr. Davis' deposition testimony?

6 MS. BAUGHMAN: Objection to
7 form.

8 THE WITNESS: Not that I could
9 recite off the top of my head.

10 Q. BY MR. ANTONUCCI: What do you
11 mean by "substantive"?

12 A. Well, I -- I believe there was
13 one case where he was talking about the --
14 when we did the post-audit and he talked
15 about the calibration target relative to Well
16 TT-26.

17 In fact, we did not have any
18 observations at Well TT-26 during the
19 extended simulation period, so that was not a
20 correct statement. That's the one that I can
21 recall, and I believe he may have corrected
22 himself, but...

23 Q. Dr. Jones, how much have you
24 billed to date in this case?

25 MS. BAUGHMAN: Objection to

1 form. We've provided the bills.

2 THE WITNESS: I've billed the
3 amount shown in the invoices that we
4 submitted.

5 Q. BY MR. ANTONUCCI: Do you know
6 what that amount is?

7 MS. BAUGHMAN: Object to form.

8 THE WITNESS: I think through
9 the end of January it would be roughly
10 \$120,000, I believe.

11 Q. BY MR. ANTONUCCI: Does your
12 payment depend on the outcome of this case?

13 A. No.

14 MR. ANTONUCCI: Okay. I am
15 going to show you another exhibit.
16 This will be Exhibit 18.

17 (Exhibit 18 was marked for identification.)

18 Q. BY MR. ANTONUCCI: This
19 document has the title "An overview of
20 current applications, challenges, and future
21 trends in distributed process-based models in
22 hydrology"; is that right?

23 A. Correct.

24 Q. There's a list of several
25 authors here, one of them being Norm Jones.

1 Is that you?

2 A. That's me.

3 Q. Okay. Were you an author of
4 this study?

5 A. I was a co-author.

6 Q. Okay. Please turn your
7 attention to Page 5 of Exhibit 18.

8 A. Okay.

9 Q. I'm looking at the very last
10 sentence on the page starting with the word
11 "Although." It's -- it continues on to
12 Page 6.

13 A. Oh, okay, sure.

14 Q. Okay. So this says "Although
15 some of those process-based hydrological
16 models include numerous distinct processes,
17 the degree of complexity and quantity of
18 processes represented varies between models
19 and influences the suitability of a given
20 model for specific applications."

21 Did I read that correctly?

22 A. Yes.

23 Q. You'd agree that a model cannot
24 capture the complexity of aquifer conditions
25 completely; right?

1 A. Yes.

2 Q. That they don't necessarily
3 reflect all real-world conditions; right?

4 A. A model, as we've discussed
5 earlier, is a simplification of reality.

6 Q. Okay. Would it be possible for
7 you to have performed a post-audit on the
8 Hadnot Point/Holcomb Boulevard model?

9 A. Yes, I assume it would be
10 possible.

11 Q. Okay. And you did not do it
12 because you weren't asked to by the legal
13 team; right?

14 A. That's correct.

15 Q. Okay. Finally, I'd -- I'd like
16 to turn back to our earlier discussion of the
17 model's ability to predict contaminant
18 concentrations at TT-26 accurately.

19 Do you remember discussing
20 that?

21 A. I -- we've discussed that topic
22 quite a few times today. In general, yes, I
23 remember discussing that.

24 Q. Okay. It's true that the ATSDR
25 used a mass balance model for determining

1 concentrations at the water treatment plant;
2 right?

3 A. That's correct.

4 Q. Okay.

5 A. Based on the concentrations and
6 pumping rates at the supply wells.

7 Q. It's also true that you did not
8 have information on the pumping rates for all
9 times during this study period; correct?

10 MS. BAUGHMAN: Objection.

11 Form.

12 Q. BY MR. ANTONUCCI: Excuse me.

13 It's true that ATSDR did not
14 have information on pumping rates during all
15 times of the study period; correct?

16 MS. BAUGHMAN: Objection. Form
17 and foundation.

18 THE WITNESS: Yes, that is very
19 standard for groundwater modeling
20 projects.

21 Q. BY MR. ANTONUCCI: Okay. Would
22 the process of performing a post-audit for
23 Hadnot Point/Holcomb Boulevard be different
24 than performing a post-audit for Tarawa
25 Terrace?

1 A. The basic process would be the
2 same. It would be extended over a -- the
3 model inputs would be extended over a new
4 period. We would not change anything in the
5 original models, other than extending it, and
6 then run the simulations and compare the
7 predicted results of the extended model with
8 any new field observed value data that were
9 available, is the general process.

10 Q. The -- the -- ATSDR's
11 calibrated model's geometric model bias was
12 lower when considering Well TT-23; right?

13 A. That's correct.

14 Q. That's because the ATSDR's
15 calibrated model demonstrated a worse fit
16 between simulated and observed conditions at
17 that well?

18 A. I think that's safe to say,
19 yes. Well, actually, the reason why -- I'm
20 not comfortable saying they didn't consider
21 it because it had a worse fit. I would say
22 that the difference in the geometric bias
23 between the two, the fact that it goes down
24 if you don't include it would indicate that
25 it -- it has a high fit at that. But I -- I

1 recall there were -- there were a couple of
2 reasons why they argued why it may not be
3 considered, but they presented both values
4 for consideration, so...

5 Q. Okay. So then ATSDR's
6 calibrated model had a sort of variable fit
7 between observed and simulated data at
8 different supply wells; isn't that right?

9 A. Yes.

10 Q. Okay. Dr. Jones, I think we're
11 coming up on the end of my questions. Are
12 there any answers you've given to my
13 questions you wish to change before we end
14 this deposition?

15 A. Not that I can think of.

16 Q. Is there any information I
17 asked you about that you didn't recall at the
18 time but now remember?

19 A. No.

20 Q. Were there questions I asked
21 that you did not understand in which I was
22 unable to clarify?

23 A. Not that I recall.

24 Q. Once it's ready, you will be
25 provided with a transcript of this

1 deposition. We ask you carefully read,
2 correct, and sign it.

3 Do you understand that?

4 A. Yes.

5 MR. ANTONUCCI: Well, thank
6 you, Dr. Jones, for your patience in
7 answering my questions today.

8 I pass the witness.

9 THE WITNESS: Thank you.

10 MS. BAUGHMAN: Dr. Jones, I
11 just have a few questions for you.

12 EXAMINATION

13 BY MS. BAUGHMAN:

14 Q. First, let's go to Exhibit 6 of
15 your -- Exhibit 6, which is your original
16 post-audit. And if you could turn to
17 Page 5-1.

18 A. Sure.

19 Q. Okay. And I think you may
20 remember earlier that counsel for DOJ asked
21 you some questions about -- or he read parts
22 of Numbers 1 through 4 under your results and
23 asked if he'd read it correctly and if these
24 things were true.

25 Do you recall that?

1 A. Yes.

2 Q. Okay. And so what you have
3 here under Section 5 Results is you wrote
4 "Before presenting the results, it is helpful
5 to remember that when simulating the
6 migration of a PCE contaminant plume using
7 MODFLOW and MT3DMS, achieving a close match
8 between simulated and observed concentrations
9 can be challenging for several reasons:" And
10 you listed four reasons; correct?

11 A. Yes.

12 Q. Now, I'm going to ask about
13 each of them individually, but is your
14 observation that when simulating the
15 migration of a PCE contaminant plume using
16 MODFLOW and MT3DMS, when doing that achieving
17 a close match between simulated and observed
18 concentrations can be challenging, is that
19 limited to Camp Lejeune and the ATSDR's
20 modeling efforts?

21 A. No.

22 Q. What -- to what extent does
23 that apply to groundwater modeling?

24 A. The contaminant transport
25 modeling with MT3DMS, there's always -- or

1 there's typically a very high variability in
2 the observed concentration data. And the --
3 the model simulates a plume representing
4 average conditions over the grid cells and
5 using some simplifying assumptions.

6 And so you shouldn't expect it
7 to -- to precisely match the observed
8 concentrations at each instance, rather the
9 overall level of fit is what is most
10 important to analyze.

11 Q. And that's true whenever you're
12 modeling a plume using MODFLOW and MT3DMS;
13 right?

14 A. That's correct.

15 Q. Okay. So if we go to the first
16 factor, you wrote that "The subsurface
17 environment is inherently complex, with
18 variations in soil heterogeneity,
19 permeability, porosity, and hydraulic
20 conductivity. These properties vary
21 spatially in ways that are not fully captured
22 in the model, affecting how the contaminant
23 plume moves throughout the groundwater
24 system."

25 Is that observation specific to

1 Camp Lejeune and the ATSDR modeling efforts?

2 A. No.

3 Q. Is that statement regarding
4 complex subsurface conditions generally true
5 for groundwater modeling efforts using
6 MODFLOW and MT3DMS?

7 A. Yes.

8 Q. Okay. Or using any model?

9 A. Yes.

10 Q. Okay. Your second factor
11 listed is "Temporal Variability," and you
12 wrote "The concentration of contaminants can
13 change over time due to factors like seasonal
14 variations in groundwater flow,
15 biodegradation, and chemical reactions.
16 Simulating these dynamic processes accurately
17 over the entire simulation period is
18 challenging."

19 Is that observation specific or
20 unique to Camp Lejeune and the ATSDR's
21 modeling efforts?

22 A. It's a -- it's a general
23 statement that would be true of any
24 contaminant transport model.

25 Q. At any location?

1 A. Yes.

2 Q. By any modeler?

3 A. Yes.

4 Q. Okay. Your third reason listed
5 is "Limitations in Model Resolution." And
6 you wrote "MODFLOW and MT3DMS rely on
7 discretizing the subsurface into numerical
8 grids consisting of cells that represent a
9 subset of the aquifer. The resolution of
10 these grids can limit the model's ability to
11 capture fine-scale variations in plume
12 behavior, particularly in areas with sharp
13 concentration gradients, small-scale
14 heterogeneities, or preferential pathways."

15 Is that observation specific to
16 ATSDR's modeling efforts at Camp Lejeune?

17 A. No, it's a general statement,
18 and I think there's evidence of this
19 specifically at Camp Lejeune.

20 Q. But the limits in modeling --
21 limitations of model resolution that you've
22 described here is a limitation that would
23 apply whenever this type of modeling is done
24 with MODFLOW and MT3DMS?

25 A. Correct.

1 Q. Okay. And the fourth factor
2 you listed is "Measurement Variability," and
3 you wrote "The observed concentrations at
4 observation wells may contain some degree of
5 measurement error uncertainty. Field data
6 collection is subject to variability, which
7 adds another layer of complexity when trying
8 to match it closely with model outputs."

9 Is that observation unique to
10 ATSDR's efforts at Camp Lejeune?

11 A. No.

12 Q. Is it a general issue on
13 measurement variability that applies in all
14 groundwater modeling efforts?

15 A. That's correct.

16 Q. Okay. You were asked, I think,
17 on numerous occasions today by DOJ's counsel
18 for what purpose ATSDR's modeling effort can
19 be used, and I want to ask you this: Can
20 ATSDR's model be used to determine -- let me
21 strike that.

22 Is ATSDR's model or models used
23 for Camp Lejeune sufficiently reliable to
24 determine the mean monthly concentrations at
25 the water treatment plant at Tarawa Terrace

1 based on the work that you've done in this
2 case?

3 A. Yes, I believe so.

4 Q. And was it necessary for you or
5 for the ATSDR modelers to know how those mean
6 monthly concentrations would be used by any
7 health professional, including an
8 epidemiologist or a toxicologist or a medical
9 doctor, in order to conduct the modeling
10 efforts appropriately?

11 A. I can't think of any
12 circumstances in how they would be used that
13 would alter the modeling process that went
14 about building the model and generating those
15 simulated concentrations at the water
16 treatment plant.

17 Q. So, in other words, if a MD,
18 PhD, epidemiologist, medical doctor wanted to
19 use the mean monthly concentrations to
20 estimate an individual exposure as opposed to
21 a group exposure, would that change how you
22 or Morris Maslia or anyone else conducts the
23 modeling?

24 MR. ANTONUCCI: Objection.

25 THE WITNESS: No.

1 Q. BY MS. BAUGHMAN: You were
2 asked a number of questions by DOJ counsel
3 regarding -- about geometric bias.

4 Do you recall that?

5 A. Yes.

6 Q. Do you know what the geometric
7 bias was that was calculated for the
8 concentrations at the water treatment plant
9 for Tarawa Terrace?

10 A. Yes.

11 Q. What was that?

12 A. 1.5.

13 Q. And that's -- what's your
14 opinion of that in terms of, you know, good,
15 bad, accurate, inaccurate, do you have an
16 opinion?

17 A. I would say in the context of
18 contaminant transport modeling that would be
19 a slight high bias.

20 Q. Okay. And did you calculate
21 the geometric bias related to your post-audit
22 work?

23 A. Yes.

24 Q. And what was that geometric
25 bias?

1 A. I calculated geometric bias for
2 the 318 observations, and the geometric bias
3 was 2.1, which is substantially lower than
4 the 3.9 to 5.9 range that they got with the
5 original model.

6 And if you look solely at
7 observation -- observation -- concentrations
8 at observation wells that are greater than
9 5 micrograms per liter, that bias drops to
10 1.2.

11 Q. And remind me, 5 micrograms per
12 liter, why is that number significant?

13 A. It's the minimum -- it's the
14 MCL.

15 Q. Maximum contaminant --

16 A. Maximum contamination level,
17 yes.

18 Q. Set by the EPA?

19 A. That's correct.

20 MS. BAUGHMAN: Okay. I'll pass
21 the witness.

22 EXAMINATION

23 BY MR. ANTONUCCI:

24 Q. Dr. Jones, you just testified
25 that the geometric model bias at the Tarawa

1 Terrace water treatment plant was 1.5; is
2 that correct?

3 A. That's correct.

4 Q. Where did you get that value
5 from?

6 A. From the modeling reports.
7 ATSDR modeling reports.

8 Q. Okay. Can you tell me where
9 specifically in the modeling reports you got
10 that value from?

11 A. Well, earlier this afternoon
12 you had me read from a table, and it was in
13 that table and a discussion of that was in
14 the prior page. I believe it's in -- you can
15 find it in Chapter A, if I recall correctly.

16 Q. Okay. And you also testified
17 that the geometric model bias of your
18 post-audit was 2.1; is that correct?

19 A. That's correct.

20 Q. It's true that you calculated a
21 geometric model bias but not a mean absolute
22 error of your post-audit; is that right?

23 A. I -- there is a mean absolute
24 error calculated, I just can't remember what
25 it was off the top of my head.

1 Q. Okay. And it's not in your
2 report; correct?

3 A. No, we did not put it in the
4 report.

5 MR. ANTONUCCI: Okay. All
6 right. I pass the witness.

7 EXAMINATION

8 BY MS. BAUGHMAN:

9 Q. The geometric bias, is there --
10 is there a table or a figure in your report
11 from which one could easily calculate the
12 geometric bias for the post-audit work?

13 A. Yes. If you take the simulated
14 versus observed PCE concentrations at the 318
15 well locations, it's -- it's a simple
16 spreadsheet calculation.

17 Q. And all of the data necessary
18 to do that is in your report?

19 A. That's correct.

20 Q. Where? Where?

21 A. It's the -- well, the most
22 recent and correct version of that would be
23 in table -- Table A1 of the rebuttal report.

24 MS. BAUGHMAN: Okay. Thank
25 you.

1 I'll pass the witness.

2 MR. ANTONUCCI: All right.

3 Thank you, Dr. Jones, no further
4 questions.

5 THE WITNESS: Okay. Thank you.

6 MS. BAUGHMAN: I think we're
7 finished. Thank you.

8 THE VIDEOGRAPHER: We're off
9 the record. The time is 4:34.

10 (The deposition was concluded at 4:34 p.m.)

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Reporter's Certificate

State of Utah)
County of Salt Lake)

I, Vickie Larsen, Certified Court
Reporter and Registered Merit Reporter in the
State of Utah, do hereby certify:

THAT the foregoing proceedings were
taken before me at the time and place set
forth herein; that the witness was duly sworn
to tell the truth, the whole truth, and
nothing but the truth; and that the
proceedings were taken down by me in
shorthand and thereafter transcribed into
typewriting under my direction and
supervision;

THAT the foregoing pages contain a true
and correct transcription of my said
shorthand notes so taken.

IN WITNESS WHEREOF, I have subscribed
my name this 19th day of February, 2025.



Vickie Larsen, CCR/RMR
Utah License No. 109887-7801
Nevada License No. 966

In Re: Camp Lejeune Water Litigation
Case No.: 7:23-CV-00897
Date: February 14, 2025
Reporter: Vickie Larsen, CCR/RMR

WITNESS CERTIFICATE

State of Utah)
ss.
County of Salt Lake)

I, NORMAN L. JONES, HEREBY DECLARE:
That I am the witness referred to in the
foregoing testimony; that I have read the
transcript and know the contents thereof;
that with these corrections I have noted this
transcript truly and accurately reflects my
testimony.

PAGE-LINE	CHANGE / CORRECTION	REASON
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-----	No corrections were made.	-----

I, NORMAN L. JONES, hereby declare under the
penalties of perjury of the laws of the
United States of America and the laws of the
State of Utah that the foregoing is true and
correct.
Dated this _____ day of _____,
2025.

NORMAN L. JONES

&	00897 1:6 7:11	102.10 172:13	150 4:22
& 2:4 47:4 48:4 55:20	288:1	109887-7801	16 5:15 227:20
0	01-00000930... 161:15	1:17 287:23	227:21,23
0 155:3	01-09 227:24	10:18 59:12	229:5
0.00050 163:6	05-22 146:6	10:28 59:15	161 4:25
0.00053 162:5	09-00006156... 119:13	10:50 266:25	166 5:5
162:14 163:3	1	11 4:25 160:25	17 5:20 259:3,4
0.001 122:16	1 3:14 7:6	161:1 162:1	18 5:22 269:16
123:8,25	15:15,17,22	221:18	269:17 270:7
124:25	17:1 36:23	1100 2:11	1800 1:15
0.005 158:4	55:17 124:15	111 1:15	183 226:8
0.2 254:15	124:20 153:15	111.6. 256:20	187 5:8
0.4. 254:16	157:19 188:12	119 4:20	19 186:24,25
0000000203.xl	238:20 254:21	12 5:5 24:4	1953 121:20,25
259:12	258:12 260:3	166:13,14	130:23 131:1
0000000299....	260:22 263:12	168:5 172:5	137:13 178:21
153:17	263:13,18	173:18 175:23	224:2
0000000479	275:22	120,000 269:10	1954 137:22
166:17	1,100 162:1	124.5 253:13	1955 122:18
0000033263	1,2 188:9	12:10 149:12	123:9 124:1
227:24	1,200 121:9,12	149:14	125:2
0005 154:6	1,580 170:17	13 4:23 5:8	1957 226:7
163:20	1-1 75:11,14,19	187:1,3 194:5	1960 125:2
0006 154:8	1.2. 283:10	13.75 172:15	1962 124:21
001 162:25	1.5 284:1	136.4 255:6	1964 188:12
002 162:25	1.5. 282:12	14 1:12 4:4,15	1967 157:19
004 151:6	10 4:22 150:11	5:9 7:1,5	1968 188:11
154:3 157:23	150:12	103:18 206:24	225:8
005 151:3	100 56:17 69:7	207:2,3 288:2	1970 125:7
006 151:7	10003 2:5	14670 287:22	132:15,20
158:7		14th 81:19	133:10
		15 3:14 5:13	1975 125:8
		44:11 48:15	1976 124:10,22
		213:8,9	

1979 188:16 1980s 43:23 1981 132:22,25 1985 161:25 162:13 170:15 204:14 225:8 1986 104:9,11 1990 162:22 1991 162:1,13 204:14 1992 94:13 1995 188:23 258:20 1998 147:9 1999 259:23 260:6 19th 287:20 1:13 149:14,16	20005 2:11 2007 104:23 145:23 2008 172:12 2009 258:20 2010 24:24 45:5,21 2014 24:24 2015 94:13 202.616.4473 2:12 2020 45:7 2022 14:22 2024 4:10 13:14 64:21 81:11 82:11 233:23 2025 1:12 4:4 4:15,23 7:1,5 81:20 287:20 288:2,24 203 259:13 207 5:9 21 243:22 251:24 212.558.5915 2:5 212246 146:7 212309 146:7 213 5:13 22 188:15 227 5:15 23 248:9,19,24 273:12	25 4:10 82:11 123:21 161:25 251.9 254:21 252.6 254:22 259 5:20 25th 81:11 26 38:3 114:25 123:20 124:9 124:20 138:3 140:22 144:25 150:23 152:13 156:16,17,19 161:25 162:7 162:10,12,17 163:2 170:14 268:16,18 271:18 269 5:22 27 44:12 188:11 245:2 275 3:6 283 3:7 285 3:8 299 153:13,14 154:12 299.xlsx. 157:17 2:42 222:24 2:56 223:2	162:4,19,23 239:17 262:13 3-12 240:19,22 240:23 3-13 264:21 3-5 251:11 3.1.2. 251:14 3.7 264:23 3.8 170:16 3.9 283:4 3.9. 248:1,25 300 44:8 302 153:11,12 318 115:18 159:11 220:17 283:2 285:14 33272 228:16 228:25 229:5 33326 227:25 334 244:1 34 79:19 206:7 350 162:1 36 113:24 204:10 360 162:21 39 16:19 3:47 261:15 3a 255:2
2			4
2 3:18 4:5 5:13 16:19 38:22 54:20 59:16 98:16 123:17 123:20 224:7 239:7 264:7 2,151 162:3 2-4 54:23 2-8 170:18 2.1 283:3 284:18 20 48:15 2000 260:15,16 260:22			4 3:25 54:21 146:23 214:1 223:3 240:5 275:22

4.2 240:12 4.33 172:14 4174 8:19 430 8:19 45 16:19 48 244:23 252:2 49 168:4 172:4 173:18 175:23 4:06 261:18 4:34 1:13 286:9 286:10	54 3:18,20,25 136:20,20 137:24 54.3 158:7 547 4:16 5:13 98:4 187:12 55 4:5 555 254:8 563.7 254:9 59 4:7	615749 225:22 615753 119:14 62 124:10 64 4:11 67.16 157:25	80 24:14 804 170:19 80s 139:14 179:2 194:23 83.8 255:3
5	6	7	9
5 4:5 38:23 55:5,6,12,14,18 56:21 157:16 226:6 250:6 270:7 276:3 283:9,11 5,000 262:25 5-1 237:4,8 275:17 5.8 247:25 248:12 5.8. 248:12 5.9 248:11 253:22 283:4 5.9. 248:19 50.4 261:2 500 262:25 517 166:17 53 136:18 137:24	6 4:7 25:1 59:21,22 60:1 63:17,25 66:18 68:1,13 69:14 69:23 70:8 72:24 73:2,17 74:13,22 75:6 75:19 145:13 204:17,23 237:4 242:1 253:23 258:13 264:24 270:12 275:14,15 6-1 72:24 73:2 60.37 158:4 60s 139:13 155:14 156:9 615652 224:15 615653 145:11 615664 146:19 615699 119:25	7 4:11 64:13,14 65:10,17 66:15 66:22 68:1,13 69:14,23 70:8 74:23 75:11,15 75:23 84:2,4 159:3 204:21 205:1,3 240:20 249:7 250:8 252:14 262:10 263:10,13,18 264:19 7.5. 257:15 7.50 172:16 700 2:4 70s 139:13 720 162:22 73.8. 256:18 732 170:19 7:23 1:6 7:11 288:1 7n 258:24	9 4:20 118:25 119:1,3,24 121:18 145:9 146:18 203:17 203:20 224:5,8 224:10 247:14 247:15 90s 194:23 93086 161:19 93114 161:16 966 1:17 287:24 97 4:16 226:20 98 253:11 9:00 266:24 9:13 1:13 7:1,5 9:25 266:24
		8	a
		8 3:5 4:16 97:21,22 103:15 106:17	a.m. 1:13 7:1,5 266:24,25 a1 224:6,14 245:14 263:7 263:10,18 264:7 285:23 a13 146:17 a18 37:22

a2 145:8 249:8 252:13,17,18	244:12,19 245:6 246:7 252:24,24 253:3,3,12,22 254:8,16,22 255:5,13,14,17 255:22 256:2,3 256:20 257:12 257:16,17,20 257:24 258:2,7 263:25 284:21 284:23	217:4,7 239:13 271:18 278:16 288:9 achieve 212:12 achieving 237:16 238:9 276:7,16 act 43:1 action 9:12 45:9,16 185:10 188:23 190:11 active 197:22 actual 154:9 218:15 229:10 229:24 actually 50:17 54:16 156:11 197:15 198:1,9 273:19 adapt 99:7 adapted 186:18 add 23:22 56:3 addition 174:3 additional 65:3 70:3,5 74:2 107:13 113:13 115:18,24 116:21 117:1 220:21 address 8:18 208:23 209:25 228:20 229:5 addressed 128:17	adds 240:10 280:7 adequately 216:13 adjacent 46:16 advection 162:18 advective 94:7 162:7 advertising 15:1 advice 26:8 advised 229:9 affect 12:20 affecting 239:3 277:22 affidavit 47:11 47:19 afternoon 284:11 age 225:4 agency 224:23 224:25 ago 9:14 16:4 45:4 62:16 109:16,17 151:19 180:25 agree 10:18 63:23 66:14 81:11,20 82:12 82:22 83:10 106:2,5 129:4 136:2 147:16 148:16,25
a21 120:3 121:17 122:6			
a25 248:15			
a26 37:23 247:14,17			
a27 203:17,19			
a48 119:24 120:2 121:18			
a7 39:1			
a8 247:18			
a9 262:9	abstract 224:18		
a98 225:21 226:18	academic 78:3 78:11 182:2 194:17		
abandoned 208:8	academy 176:12		
abc 130:23,25 156:18 162:8	accepted 265:7		
aberjona 200:7	accomplished 82:20		
ability 11:18 12:20 239:23 271:17 279:10	account 129:13 148:4 169:11 170:25		
able 11:1 186:14 195:11 217:16	accuracy 117:1 182:18 220:22		
above 124:25 240:12	accurate 12:13 55:24 64:5 98:12 130:2 131:18 173:6 182:15 189:19 232:6 282:15		
absence 173:18 174:20 175:8	accurately 11:2 12:20 209:6,23		
absolute 52:16 172:6 229:11 229:24 235:5 243:17,18,25			

167:24 170:10 175:7,15 178:19 210:16 220:23 256:24 267:13 270:23 agreement 234:22 247:1 247:10 ahead 91:15 131:7 air 144:5 airport 258:23 al 145:22 alabama 18:14 19:6,10 20:4 21:18 23:13 25:7 28:3 101:8 alanna 2:17 alexander 92:17 algorithm 209:5 algorithms 22:5 24:10 26:10 209:20 allison 2:21 allow 42:4,5 allows 36:8 160:13,15 alter 281:13 america 1:8 288:22	american 207:12 amount 21:2 44:16 52:17 116:9 142:3 192:4 219:24 269:3,6 analyses 119:4 161:3 190:15 191:10 218:16 228:2 analysis 24:11 32:13,17,21 33:6,10,14,19 33:24 34:4,11 34:17 35:1,19 36:13 37:20 62:2 85:18,22 86:5 87:17 88:18 100:15 100:23 105:25 108:4,25 109:15,24 118:6 120:18 151:1,18 157:12 158:23 159:12 163:23 164:12,14,20 175:5 179:12 194:20 195:24 216:5 226:3 230:7 245:15 analytics 58:20	analyze 32:20 58:20 218:16 244:17 277:10 analyzed 14:11 analyzing 22:6 anderson 94:7 95:3,22 98:20 99:3,8 annual 207:12 answer 10:6,7 10:7,8,15 11:4 11:17 12:6,7 12:25 33:13 71:2 118:13 153:21 186:13 214:4 215:11 217:16 218:1 226:1 231:10 256:12 answer's 231:4 answered 76:7 117:19 231:15 answering 131:14 145:7 215:23 275:7 answers 238:4 274:12 antonucci 2:9 3:5,7 7:20,21 8:12,22 15:6 15:14,18 30:2 32:1 33:2,12 34:6,18 35:4 39:21,25 40:6	40:10 48:22 52:10 53:5,16 53:24 54:3,15 54:25 55:7 57:6 58:22 59:3,8,18,23 64:18,23 65:4 65:8 67:25 68:10,20 69:9 69:19 70:4,17 71:14 72:12 73:15 74:10,21 76:2,11 78:10 78:15 79:14 81:17,25 82:18 83:2,16 90:21 91:14 93:10,19 94:4 95:12 96:13 97:10,16 97:19,23 100:13 101:5 102:16 103:13 104:11 106:13 107:6 108:8 110:14,22 112:15 113:4 117:14 118:2 118:16 119:2 127:5 129:11 129:16 131:11 132:1,21 133:14 134:5 134:24 136:11 137:11 138:7
--	--	--	--

138:17,22	232:14,20	applications	22:16 24:7
139:16,23	233:5 234:4	5:23 269:20	29:15 30:8
140:5 141:3	237:2 251:6	270:20	35:10 86:13
143:12,21	252:17 256:15	applied 20:23	114:9 128:22
145:6 148:10	259:5,11	21:23 94:5	129:2 130:18
149:8,19	261:12,19	163:4,7 210:4	133:25 134:12
150:14 158:19	266:6,12	222:4 234:10	134:25 135:15
159:25 160:23	267:14,20	applies 280:13	142:4,23 184:8
161:2 163:21	268:3,10 269:5	apply 182:4	195:1 197:5,14
164:5,24	269:11,14,18	211:16 276:23	197:18,21
166:11,15,24	272:12,21	279:23	198:23 200:8
169:3,20 172:1	275:5 281:24	applying 162:3	201:21 202:5,9
173:16 175:7	283:23 285:5	162:22	202:15,16
175:17 176:13	286:2	appreciate	203:5,8 209:11
176:20 182:17	anwar 2:9 7:24	16:14 36:22	209:23,25
183:14 186:22	7:24	39:17 64:2	212:2 221:1
187:1,4 189:10	apart 111:8	84:1 117:15	222:2,3 239:21
189:20 190:4	138:8 160:20	119:23 203:16	270:24 279:9
201:20 202:3	apologize	204:16 258:11	aquifers 21:17
203:15 206:23	252:10	approach	22:6 24:7 29:9
207:1,4,17	appear 207:10	178:7	51:23 58:21
208:22 211:7	appearances	appropriately	aral 42:20 80:7
211:19 213:7	2:1	281:10	82:11,19 113:6
213:10 215:2	appeared 91:21	appropriaten...	118:20 151:8
215:12,20	appears 61:7	165:5 265:25	154:19 158:6
216:15 217:6	98:14 150:18	approximately	172:12 183:4
217:12 218:2	155:12 188:19	41:12,19 50:24	area 49:6,15
219:12 221:11	appended 64:4	51:6	79:23 95:10
222:13,21	65:24	approximates	116:13 128:18
223:5,13,16	appendix 39:1	162:14	129:10 140:23
224:4 226:23	241:7	approximatio...	149:6 196:21
227:18,22	application	104:16 106:3	242:15
230:21 231:7	176:4	aquifer 21:3,7	areas 23:9
231:12,18		21:8,16 22:1	128:9 225:18

239:25 279:12 argue 130:5 179:4 220:16 argued 131:17 194:11 274:2 arithmetic 160:18,21 arlen 100:3 arrival 87:2 122:11 123:15 124:13,14 125:25 126:6 131:2 133:2 156:23 arrived 126:2,8 126:13,21 127:15 art 234:10,12 article 177:5,20 180:24 181:21 articles 26:6 78:21 79:9,15 79:21 aside 75:5 106:17 210:7 asked 11:12 25:15 42:3,4 71:18,20 73:24 74:1 76:7 88:20,25 89:18 90:20 92:13 93:13 101:25 102:3,9 106:20 106:24 107:8	107:13,24 109:14,25 117:19 164:2,5 182:25 183:1 185:22 189:21 219:20 231:15 252:8 271:12 274:17,20 275:20,23 280:16 282:2 asking 34:6 117:24 132:24 133:1 169:24 asks 177:14 assess 23:5,14 206:15 234:18 assessing 265:9 assessment 5:17 227:4 228:9 234:6,23 235:1 249:23 assessments 234:10 assigned 147:2 associate 25:7 associated 86:22 87:10 88:18 174:1 191:10 192:1 associates 47:4 48:4 association 227:13	associations 225:3 assume 11:25 121:10 133:18 204:9 271:9 assumed 51:11 121:8,24 127:19,23 130:22 148:21 assumption 111:15 145:21 assumptions 277:5 atsdr 3:18,20 4:20,25 5:18 37:3,8 62:4 69:4 91:6 101:24 110:5 110:16,25 112:18 121:2 127:23 130:21 136:15,18 148:21 151:4 154:18 158:3 164:11,19 165:1 167:2 204:8 214:19 215:5,15 216:18,25 219:14,25 221:4 222:15 222:18 224:25 225:13 228:9 228:21 229:7	230:8 248:4 265:5 271:24 272:13 278:1 281:5 284:7 atsdr's 68:3,11 70:6 76:3 85:3 85:7 89:7 91:23 102:3 106:20,25 110:1 112:6,9 112:17,20 120:18 121:23 136:5 148:11 148:16 161:3 165:9,18 166:3 166:7 168:1 176:25 184:9 210:4 216:23 223:7,18 226:2 227:3 273:10 273:14 274:5 276:19 278:20 279:16 280:10 280:18,20,22 attachment 4:24 16:15,17 attention 63:16 101:24 103:14 247:14 262:9 270:7 attorney 7:13 8:23 13:23 15:1
---	---	--	---

attorney's 1:14	251:1,7,8,19,22	259:25 260:8	63:17 64:3
attorneys 12:4	252:1,9 259:20	260:19 273:9	72:21 84:2,20
40:25 47:17	264:16,24	average 147:6	102:13 103:14
attributed	265:14,22	147:17 148:3	149:15 150:9
104:2,18	268:14 271:7	162:15 243:15	153:4 178:18
auburn 19:12	272:22,24	243:18 244:11	184:6 198:1,7
audit 4:3,9,14	275:16 282:21	255:12 257:13	198:9 202:17
27:10 60:8	284:18,22	257:25 277:4	211:24 223:1
65:13 67:8	285:12	averaged 143:2	233:9 236:3,9
71:18,21 79:3	audits 234:11	averaging	241:24 260:2
88:2,6,21	augmenting	169:12 171:1	261:17 271:16
89:19 90:23	5:9 207:19	171:12 257:13	background
92:3,7,11	august 188:11	aware 14:6,7	25:9 94:23
102:9,11	author 93:1	14:10,12 15:12	backslash
106:20 107:9	163:11 270:3,5	25:8 72:10	248:1
112:8,19 113:7	authority 44:1	100:4 121:1	bad 111:14
113:11 115:17	93:4,9,11 95:4	146:16 148:15	282:15
116:3,8 117:4	100:6,25	165:8,13,17,23	balance 21:10
117:9,22	authors 269:25	166:6,25	147:4,13 198:3
121:14 122:4	automated	167:17 176:21	257:10 271:25
123:4 164:25	31:12	183:13 193:17	balanced
167:21 171:17	automatically	212:17 221:10	116:14 242:16
214:22 215:6	245:10	236:5,15	250:21 251:25
215:16 216:16	availability	axis 155:25	252:4 257:4
216:19 232:21	28:17 29:19	156:3 249:11	balances 28:18
232:22 233:17	43:25	249:13	band 157:10
233:20,21	available 49:22	b	179:13,16,25
234:6 236:2,4	50:1 51:12,13	b 3:12 16:19	180:2,15
236:7,16,20,23	113:14 117:17	86:12 122:21	bars 173:10
240:15 241:2,4	118:4 196:7	214:4	base 68:4 119:7
241:15 243:22	199:1,12	bachelor's 57:7	120:7 161:7
244:1,22 245:3	201:19 204:8	back 9:20	203:23 228:5
245:6 246:8	205:25 225:12	43:23 59:14	based 6:1 19:20
250:22,25	258:16,20		26:11 33:13

47:21 91:18 114:7 117:3 120:22 130:3 130:20 147:7 150:19 152:18 155:25 168:13 194:5 197:16 201:18 205:24 222:4 251:9 269:21 270:15 272:5 281:1 basic 28:10 102:17,20,22 193:5 273:1 basically 35:2 214:14 basin 44:13 basis 50:7 79:22 94:20 167:25 238:1 256:6 bates 119:12,14 119:15,25 145:11 146:5 146:19 153:11 161:14,19 166:16 224:15 227:23 228:15 259:7,14 baughman 2:3 3:6,8 8:1,1 15:2 29:25 31:20 32:23 33:7,25 34:13	34:22 39:18,23 40:2,9,18 48:19 51:18 52:19 53:12,23 54:1 57:2 58:12 59:4 64:24 67:21 68:6,14,23 69:15,24 70:9 71:4 72:8 73:11 74:6,15 75:24 76:6 78:4,14,23 81:13,22 82:14 82:24 83:13 90:14 91:7 93:6,12,21 95:6 96:6 97:6 97:12 100:9 101:1 102:5 103:7 106:7 107:2,10 110:7 110:17 112:11 112:22 117:18 126:23 129:7 129:14 131:5 131:13 132:17 132:23 133:6 134:1,18 136:7 137:5,18 138:11,25 139:19 140:1 140:24 141:6 143:19 144:1	148:6 149:3 158:12 159:6 163:14,25 164:21 166:22 168:22 169:15 171:8 173:12 174:14 175:13 176:8,15 182:9 183:8 189:6,16 190:1 193:25 201:12 202:1,6 208:18 210:22 211:12 213:2 214:24 215:7 215:17,22 217:1,9,18 218:5 221:7 222:12 223:9 223:20 226:13 226:19 230:15 231:1,9,14,24 232:16,23 233:25 236:24 251:4 252:15 256:11,14 259:9 266:2,9 267:6,16,24 268:6,25 269:7 272:10,16 275:10,13 282:1 283:20 285:8,24 286:6 bear 92:16,22 92:23	beatrice 188:11 began 130:17 132:15 143:13 beginning 38:19 81:9 107:18 119:12 155:1 170:5 184:25 242:7 251:13 begins 27:24 behalf 25:15 52:12 behavior 35:10 239:24 279:12 believe 13:18 16:3 17:15 22:5 28:15 29:21 31:11 47:11 50:2,3 50:14,17,23 54:9 58:8 62:17 67:1 74:18 77:6,22 79:5,13 80:7 82:15 85:16 86:1,6 87:14 95:8,20 96:19 109:11 110:20 112:6,17 113:24 116:24 117:3,10 124:5 131:20 135:21 141:16 153:6 179:23 185:15
--	---	---	---

193:6 195:19 196:8,24 198:17 199:14 207:11,24 220:19 226:22 231:3 233:22 236:6,21 259:21 268:12 268:21 269:10 281:3 284:14 believed 130:10 bell 13:20 60:9 159:15 beneficial 61:17 benefit 160:5 benefits 105:23 160:13 best 10:22 11:18 35:7 105:20 173:22 181:6 201:18 202:21 205:25 208:12 216:2 better 140:21 178:7 beyond 23:22 57:5 164:17,18 175:24 219:4 bias 114:14 116:19,19,22 142:12 235:7 246:12 247:9 247:25 248:9	248:18,24 251:1,8 252:1 252:4 273:11 273:22 282:3,7 282:19,21,25 283:1,2,9,25 284:17,21 285:9,12 biases 248:5 bifurcated 193:14 194:12 big 24:1 111:21 132:15 bigger 24:15 bill 2:18 billed 268:24 269:2 billion 44:11 bills 269:1 biodegradation 108:9,10,13,18 109:6,8 172:8 174:2,9 239:11 278:15 birth 225:6 births 225:7 227:13 bit 22:12 153:5 172:2 174:22 179:18 black 123:12 123:23 124:9 125:18 219:9 226:24	blown 144:6 blue 122:7,10 122:15 125:10 226:16 board 136:17 bolton 2:3 4:24 8:3,3 40:18 64:15,20 65:2 65:7 book 93:16,20 94:3 95:10 96:10,18 100:12 185:10 188:23 books 78:21 79:8,15,21 boston 185:7 bottom 119:21 157:18 197:2 242:7 263:18 boulevard 89:9 89:22 90:2 91:5,23 92:8 92:12 271:8 272:23 bound 220:6 boundary 49:19 192:24 193:5 212:10 219:10 bounds 172:11 bove 17:12 box 104:18,21 207:21 208:2	box's 105:14 boxes 207:21 boy 48:12 brand 198:21 break 12:24 13:2 22:11 40:1 59:1,9,13 149:9,13,24 150:10 222:22 222:25 261:13 261:16 breaks 12:25 brief 208:9,17 briefly 40:23 brigham 4:16 25:2 55:21 60:18 80:21 bring 19:23 broad 20:16 24:9,12 158:25 216:9 broader 142:22 broadway 2:4 brought 52:11 54:18 143:1 build 44:8,12 113:19 174:22 186:8 198:7,8 198:10 200:9 209:23 210:18 building 104:23 205:24 206:22 281:14
--	--	--	--

built 21:19 30:22 46:24 113:14,16 190:13 192:21 193:2 206:9 211:23 214:16 bullet 168:8 169:7,8 170:5 172:4 173:17 175:21 bunch 44:23 burlington 46:17 buttons 177:12 byproduct 180:16 byproducts 86:23 172:8	198:1 202:17 245:5,11 253:6 255:11,11,13 255:18 257:25 259:19 282:20 285:11 calculated 243:6 248:4 251:23 255:21 282:7 283:1 284:20,24 calculating 136:3 137:3,16 140:22 190:20 257:22 calculation 147:17 148:12 285:16 calibrate 31:25 35:7 113:22 129:24 130:7 141:17 193:7 197:7 199:8 201:4 211:10 212:22,25 214:6 216:13 220:3 calibrated 113:3,20 122:24 123:7 130:1 142:10 151:23 163:6 165:1 214:10 216:1,16,24	219:14 248:6 264:15 273:11 273:15 274:6 calibrating 143:7 calibration 30:24 31:3,6 31:24 32:14 70:23 88:15,18 100:14,22 101:4 114:11 115:4 168:1 196:6,9,12 198:12 202:25 214:3 216:20 218:11,18 233:6,7,12 234:19 244:18 247:24 268:15 call 62:21 63:1 135:8 155:19 165:22 201:16 234:23 called 8:9 13:21 24:20 32:3 36:11 186:2 camp 1:4 5:7 7:8 8:25 13:7 14:1,4,7,9,20 15:7 17:5,20 17:25 18:2 42:25 68:5,12 70:7 76:4 119:7 120:7	161:7 167:2 173:1 183:7 199:18 203:23 225:5,10 227:7 228:6 276:19 278:1,20 279:16,19 280:10,23 288:1 cancers 225:7 227:14 capacity 15:8 60:23 96:16 123:21 caption 120:1 151:22 capture 239:23 270:24 279:11 captured 105:14 239:2 277:21 captures 160:7 career 56:18 63:15 79:9,16 94:1 101:18 185:8 205:19 206:8 careful 89:25 181:25 carefully 87:15 90:9,17 92:20 167:12 169:5 275:1
c			
c 7:2 24:21 85:4 85:10 86:10 88:4,5,13 89:23 110:21 111:5 123:13 123:24 178:11 c13 254:5 c17 254:14 c3 253:8 c5 262:17,18 263:20 264:3,8 c9 253:21 calculate 144:7 163:19,22			

carlo 36:11 70:22 175:4	268:24 269:12 281:2 288:1	211:15 212:8 214:14 219:2,4 227:13	changed 151:13
carolina 1:2 7:10 9:2 13:10 119:8 120:8 161:7 203:24 228:6	cases 26:8 30:7 43:13 48:1 51:16,23 57:5 105:19,24 202:20 206:15 258:8	certainly 87:16 88:3 174:23 177:22 178:11 182:3 207:6 212:19 246:2	changes 29:11 66:7 67:7,13 112:9,20 128:12 137:25 155:20 241:19
carson 43:7		certainty 169:1 172:17 173:11	changing 23:6 209:7
case 7:10 9:10 18:10,22 35:3 35:21 38:21 42:11,18 46:3 46:13 47:2,12 47:24 48:5,11 48:11 53:21 54:6 61:5 69:11,13,20,22 72:3 73:22 77:7 80:3,4 81:6 109:9,13 115:22 140:11 159:10 174:18 176:1 181:7 185:7,9,18 186:7,9,15 187:9 188:12 190:7 191:10 192:1,3 194:7 194:19,22 195:5 197:3 198:19 199:4 199:18 200:10 206:9 235:11 237:22 268:13	castle 86:13 222:2 catch 71:12 categories 73:6 152:16 category 252:25 cause 195:8 caused 46:22 116:11 ccr 1:16 287:23 288:2 ce 4:16 5:13 98:4 187:12 cells 239:21 277:4 279:8 center 114:20 152:7,9 188:3 261:21 262:6 262:12 263:3 centered 25:6 central 44:7 certain 36:9 61:17 178:20 186:12 189:4 189:14 193:21	certificate 287:1 288:3 certified 287:4 certify 287:6 chair 18:14 19:15 24:18 challenges 5:24 205:7,14 209:10 269:20 challenging 237:18 238:11 239:14 276:9 276:18 278:18 chance 55:8 158:18 change 20:21 21:1,9 22:1,15 56:3 75:2 120:21 121:15 196:25 209:12 217:16 233:9 239:9 273:4 274:13 278:13 281:21 288:10	chapter 3:18,20 4:20,25 37:8,9 37:9,16,22,23 37:24 69:3,4 86:5,12,16,20 87:1,8,18 88:13,16 96:19 110:20 119:10 145:22 146:3,4 146:9 161:9 163:24 221:12 221:18 224:6,9 224:11 247:15 284:15 chapters 54:19 85:4,7,10 86:9 87:17,21,25 88:3,6,24 89:1 89:4,22,23 91:5 111:5 178:11 characterize 23:7 29:10 141:2 184:7 201:18 209:3

220:24 characterizing 57:24 chargaff 104:2 chart 99:8 chats 17:3,23 check 236:9 chemical 104:8 239:11 278:15 chemicals 188:9,14 chemistry 104:8 cheng 92:17,22 child 224:23 childhood 185:14 196:2 225:6 227:14 children 191:2 227:14 chloride 172:16 172:24 chlorinated 194:24 199:19 choose 105:4 circle 150:9 circumstance 257:1 circumstances 68:21 211:16 217:22 258:1 281:12 cite 86:2 267:19	cited 78:19 79:4,5,11,13 84:14 95:1 167:8 cities 44:3 city 1:15 7:14 43:7,22 civil 2:10 16:18 55:20 57:8 72:6 185:10 188:23 190:11 cl 153:17 154:12 259:8 clarification 11:25 258:11 clarify 11:24 56:5 67:4 68:8 93:13 118:17 131:15 274:22 class 9:11,12 45:9,10,15 105:7,11 186:7 212:18 213:16 218:19 classic 159:15 classify 90:24 clean 143:23 cleaner 130:23 cleaners 130:25 156:18 162:8 cleaning 133:15,23 clear 71:1 127:1,17 210:2	clearly 88:23 159:17 clement 25:17 101:7,11,15,16 165:24 176:21 177:1,9 180:24 181:3 clement's 181:19 clja 119:13 146:6 161:15 166:17 227:24 close 89:20 101:19 134:9 155:18 234:21 237:16 238:10 276:7,17 closed 197:16 closely 86:25 114:18 240:11 280:8 closer 156:14 cluster 185:13 clustering 250:4 coaching 42:7 code 32:10 100:19 codes 32:3 coefficient 150:20 221:6 222:10,15 coefficients 156:25 222:1	colleague 46:4 46:8 48:23 collected 185:24 196:9 200:8 collection 52:7 142:19 240:9 280:6 column 152:25 153:2,22,24 154:4,7,18,19 154:19 224:17 247:22,24 248:16 260:24 columns 154:18 155:7 combination 220:7,11 combinations 211:9 combine 209:20 come 9:19 35:7 72:21 144:16 comes 21:5 117:6 142:21 comfortable 68:17 94:2 219:8 273:20 coming 21:11 104:7 144:13 144:24 200:3 274:11
--	---	--	---

comment 30:11 231:6	238:19,23 277:17 278:4	133:2 138:2,4 141:16 144:8	144:20 145:19 146:12,14
common 210:14 233:14 234:18	complexities 220:25	144:13,19,25 145:5,17 147:6	147:2,23 148:17 150:22
commonly 108:17	complexity 210:18 211:2 240:10 270:17	147:24 155:3 156:24 157:24	151:15 152:9 152:12 153:3,7
communicati... 16:21 17:4,24 18:8,21 19:1	270:24 280:7	159:20,23 160:8 172:22	153:23 154:1 156:1,7,8,17
community 172:20 234:15 265:8	complicated 62:23	174:8 179:1 200:3,8 229:11	157:3 158:15 158:20 159:11
company 9:13 9:16,17	components 28:10	229:17,18,25 239:8,25 243:4	159:24 160:1 160:16,19
compare 91:2 146:12 273:6	comport 16:10	243:5,10,12 246:24 277:2	161:24 163:1 170:16 171:13
compared 191:1 251:1,8	compound 162:13	278:12 279:13	171:14 172:7 172:13,24
comparing 233:2,12 262:1	comprehensive 87:19 88:9	concentrations 38:5 50:5	173:3,24 179:3 179:14 180:4,5
competent 82:3	compress 160:14	113:23 114:1 114:13,15,16	180:11 189:22 190:21,22,24
complete 10:7 11:10 55:24 56:6 72:7 73:9 73:21,24 75:21 209:14	compute 147:5 computed 162:18 163:1	114:17,21,23 115:13,15,19 115:20,25	191:19 193:10 195:13 199:9 199:11 200:2
completely 28:24 90:10 270:25	computer 26:10 221:2	116:6,10,23 117:6 120:22	216:4,8 220:9 220:12,13
complex 100:15,23 205:7,14 210:12 238:14	concentrated 261:21	125:12,15,19 125:22 129:24	223:25 232:4,9 237:17,23,25
	concentration 57:9 114:6 120:4 122:16 123:7,24 124:25 126:11 126:15,19 127:3,8,12 128:7,12,21	129:25 130:2,4 130:15 131:9 131:24 138:8 139:7,9 140:13 140:22 141:13 141:21,24 142:12,13,15 143:10 144:17	238:11 240:6 240:14 242:14 242:18,23 244:15 245:13 246:5,15,18,19 246:25 247:4,4 247:11 249:12

249:14,19	103:6 113:2	consider 87:8	constructed
261:23 262:5	119:9 134:21	91:12 93:2,20	116:7 184:20
262:24 263:24	135:4,12,12	95:2 97:14	construction
264:3,12,17	161:9 192:24	100:5,22	55:20 88:14,17
271:18 272:1,5	193:6 198:13	101:18 112:3	constructive
276:8,18 277:8	205:8,15 212:9	139:3,24 140:6	105:13
280:3,24 281:6	212:11 214:15	143:5 144:10	consult 94:18
281:15,19	225:14 228:7	158:17 184:16	consultant 57:4
282:8 283:7	238:14,19	273:20	consulting
285:14	270:24 271:3	consideration	56:22,25 60:25
concept 135:24	273:16 277:4	140:10 274:4	62:9
concepts 4:18	278:4	considered	consumer
96:11 167:18	conduct 102:9	36:3,17,18	128:3
conceptual	281:9	60:3 64:4,7	consumer's
27:21 28:2,7	conducting	65:25 77:7,11	127:20
28:10,12 30:14	79:3 88:21	77:13,15,19,20	contact 196:10
96:21 110:23	121:13 225:1	77:25 78:13,18	contacted
111:4,8,12	conductively	80:2 84:3,7,12	185:18,21
112:6,17,25	202:11	84:16,24 85:3	contain 240:7
173:21 175:10	conductivity	89:14 96:4	280:4 287:16
175:25 192:25	202:18 212:14	140:19 145:19	contained 21:3
193:5 212:9	239:1 277:20	160:10 274:3	68:13,19 69:13
concern 48:11	conducts	considering	69:23 70:7,15
concluded 45:7	281:22	246:4 273:12	70:25 71:3
190:11 286:10	confidence	consisted	72:14,17 73:17
conclusion	36:10 70:22	141:19	76:5 154:14
130:13 265:5	confident	consistent	198:23
conclusions	236:18	113:1	contaminant
73:3,6,10,14,16	confirm 236:3	consisting	38:25 48:10
74:13,18	conflating	239:20 279:8	58:3,11 61:1
112:21 181:17	194:3	constant 121:8	79:20 87:11
condition 220:5	conservation	121:11 155:15	88:19 92:16
conditions	147:8 148:22	construct	93:3 108:17,21
49:19 57:25		198:19	108:23 119:4

135:17 136:14 137:12 142:25 148:12 158:15 158:20 161:4 172:22 176:5 186:4,11 190:6 199:11 205:10 225:11,15 226:6 228:3 230:4,13,24 231:22 237:15 239:3 271:17 276:6,15,24 277:22 278:24 282:18 283:15	contamination 14:5,8,13,19 15:13 46:6 48:25 53:7 116:2 126:2,8 126:13,21 127:14,18 128:6 129:5 130:17 132:15 132:20 133:9 134:12 185:11 188:15 193:20 199:9 265:10 283:16 contaminations 127:24 content 76:3 95:14 119:18 186:20 213:18 contention 46:18 contents 187:22,25 288:8 context 18:17 69:17 70:20,21 71:6 73:23 106:11 111:6 134:14 140:4,8 144:4 167:20 168:25 170:1 173:15 182:25 200:20 208:21 211:15,21	213:5 282:17 continue 99:13 172:3 199:25 continues 270:11 continuing 264:6 continuity 147:8 148:21 continuous 206:3 contribute 172:18 contributed 188:14 contributor 115:1 control 16:25 controversial 181:12 conversation 178:1 181:9 conversations 17:3,18,23 177:13,21 copies 39:15,19 39:22,24 40:1 54:17 192:22 copy 37:10 39:3 55:25 56:3 62:14 64:6,16 98:12 120:15 138:14 224:10,13	corner 152:12 corps 68:4 119:7 120:7 161:7 203:23 228:5 correct 13:5 19:18 26:21 32:5,8 37:14 40:19 49:2,5 52:13,14 55:23 56:16 60:5 61:8,9 62:20 63:13 65:14 66:13 67:9,12 73:4,8,20 74:23,24 75:17 75:20 76:21 77:16,17 80:16 81:3 84:10 85:4,5 86:13 86:14,18,24 87:5,6 92:5,9 94:12,14 98:8 98:21 100:21 101:10,13 102:2,24,25 103:3,6,9,22 104:3,12,20,25 105:3 106:16 106:22,23 108:13 109:4 120:20,25 121:15,20 122:5,14,19
contaminants 5:5 46:18 50:8 52:17 53:2 86:16 107:20 129:2 130:22 131:2 145:17 146:13,15 147:18 156:18 157:6 173:4 189:2,12,22,25 191:19,23,24 192:13 193:11 193:19 195:8 220:6 239:9 278:12 contaminated 115:1 143:24 225:5,17 226:4 227:7			

123:1,10,18	255:3,7 258:22	214:7 222:6	course 28:24
124:17,23	259:1 261:3,5	225:19 226:10	78:21 79:16
125:24 126:10	262:22 263:2	226:22 227:9	80:11 95:19
127:16 129:16	263:25 264:1,5	227:16 229:19	97:2 98:3,13
136:2 140:23	264:14 265:20	236:4 237:19	116:1 126:5,18
147:21 156:5	266:1,16,17	238:4 239:5	186:4 192:5
158:2,5,8	268:20 269:23	240:3,16	198:22 205:19
165:3 167:4	271:14 272:3,9	241:11 242:19	courses 56:24
168:20 169:1	272:15 273:13	249:4 265:11	61:2 186:18
169:13,18	275:2 276:10	270:21 275:23	court 1:1 7:9
177:3 181:4,20	277:14 279:25	284:15	7:17 8:6 9:1
183:5,21 185:2	280:15 283:19	correlation	10:12,21,25
201:1 203:25	284:2,3,18,19	191:5 195:25	13:9 43:6
204:4,5,14,15	285:2,19,22	196:3	47:15 200:10
214:8 215:11	287:17 288:23	correspond	287:4
221:3 222:20	corrected 74:22	114:24	cover 60:7
230:9 234:8	76:23 235:17	corresponden...	158:25 198:5
235:12,25	236:12 268:21	17:2,17,22	209:18
236:14 237:20	correcting	18:18	covered 50:25
238:12,17	256:7	corresponding	create 98:5,9
239:6,15,16	correction	154:6	187:15 200:18
241:17,22	288:10	council 176:11	created 32:6
242:25 243:16	corrections	counsel 7:18	109:23 110:25
243:20,23,24	11:12 76:13,19	59:17 143:14	creating 200:22
244:2,3,6,7,10	241:14 288:8	149:18 223:4	201:10
244:11,15,21	288:19	275:20 280:17	creosote 48:14
245:4 246:9,16	correctly 17:14	282:2	criteria 20:15
246:21,22	22:17 23:12	countless 79:21	critical 26:17
247:1,2,6,7,11	25:23 104:4,19	233:3,15	47:6 90:19,22
247:12 248:6,7	145:25 147:10	county 287:2	90:25 106:1
249:16,20	163:8 168:18	288:5	critique 47:9
250:17,23	170:21 171:2	couple 60:9	47:22 167:1
252:6,7,25	174:10 188:17	109:16 150:8	176:25 178:14
253:1,4 254:23	205:11 208:13	180:25 274:1	179:24 186:9

critiques 165:9 165:13,14,18 165:22 166:1,7 178:4 181:19 181:23 curious 91:1 current 5:22 8:18 174:3 226:5 228:21 229:7 269:20 currently 9:1 56:10,20 101:20 187:24 208:23 213:22 curve 159:16 209:24 curves 139:6,10 139:11 155:14 156:14 custody 16:25 cut 29:17 cutting 181:24 182:1 cv 1:6 7:11 55:15 288:1	22:10 24:11,11 49:23 50:1,5 51:7,11,17,21 52:6,8 58:20 61:23 62:2,3 62:24 77:20,23 110:4,11,16 112:8,19 113:7 113:13,17,19 116:21 117:17 118:4,9 132:22 141:16,19 143:7 154:13 154:24 158:23 159:20,23 160:9 162:4 168:16,16 170:8 173:19 173:25 174:21 174:22 175:8 179:1,5 185:23 185:25 186:1 193:7 196:6,12 196:17,25 198:3,5,15,18 199:1,2,4,16 200:2,9,17,22 201:6,19 202:25 203:21 204:3,7,10 205:8 206:1,3 206:5,10,13 207:19 208:3 208:12,24	209:20,21,22 211:25 212:25 214:6,11,23 215:6,16 216:18,25 217:5,8 219:23 219:24,24 220:2,10 221:5 222:9,14 223:6 223:18 224:21 225:11 240:8 248:9,18,24 258:16,20 259:18,25 260:8,19 261:6 273:8 274:7 277:2 280:5 285:17 data's 199:7 date 9:14 13:16 13:18 121:19 121:24 122:3 131:18 136:13 138:1 140:18 153:25 157:18 188:13 220:19 235:22 268:24 288:2 dated 4:3,9,14 4:22 288:24 dates 131:16,20 131:21 132:11 137:9,21,25 140:19 153:1	david 17:10 davis 2:20 37:10 41:5,6,9 42:23 60:11,15 61:11 62:17 63:10 66:8 153:17 154:12 259:12 266:15 267:4,15,21 268:5 day 20:5 119:9 121:9,12 161:8 162:5,14,25 163:4,7 228:7 287:20 288:24 days 27:5 101:18 162:3 162:22 dbolton 2:6 dc 2:11 dce 172:15,24 deal 57:19 58:2 102:17,23 dealing 13:22 205:8,22 206:5 206:12 dealings 18:24 dean 13:23 40:21 deanna 2:19 debated 128:10 decay 108:16 108:23
d			
d 3:2 7:2 92:17 124:5 254:14 damages 46:23 dash 259:11 dashed 249:17 data 5:10 16:23 17:3,23 22:9			

december 137:13	delivered 145:16,20	40:13 41:14	designed 28:13
decide 167:11	146:13,15	42:1,21,23	despite 205:4,6
decided 43:23	172:9 190:25	43:4 58:24	detail 23:23
44:4 61:16,20	225:17	69:18 70:14	85:9 87:24
declare 288:6	delivery 196:1	143:13 179:19	160:16 235:10
288:21	demonstrated	185:1 266:13	detailed 85:17
deep 44:6	273:15	266:15,19,23	88:9,14,17
deeply 14:17	dennis 2:18	267:1,4,5,23	details 31:5
defects 225:6	department	268:5 274:14	110:13 164:15
227:13	2:10 5:16 8:23	275:1 286:10	detection 264:4
defendant 1:9	55:20 63:11	depositions	264:12
defendants 2:7	165:15 166:2	42:17,25	determination
defense 63:11	224:25 228:8	depth 87:16	22:2
194:10	depend 269:12	derived 180:5	determine
deficit 23:2	dependent	203:21 204:2	29:18 52:16,23
define 93:11	21:10 126:1,7	describe 111:2	147:24 189:22
defined 145:14	126:12,20	150:1 192:19	193:10 197:3
definitive 174:7	127:14 130:17	196:17 205:17	197:13 201:1
178:22 217:25	depending	described 28:9	209:6,8 218:24
degradation	111:19 135:3	28:14 57:5	227:4,12
86:23 162:4,13	208:20 211:22	71:7 87:24	230:23 280:20
162:15,18,24	214:15	111:5 152:5	280:24
163:3,6,12,19	depends 134:14	187:9 194:13	determined
degrade 195:1	140:3,8 173:15	199:7 206:6	35:24 89:4
degraded	200:20 202:8	233:6,11	108:6 147:4
162:16	211:14 213:5	257:23 279:22	determining
degreasing	218:8	describing	22:6 189:24
48:13	deposed 9:10	147:14 153:21	191:18 230:12
degree 57:11	43:15,16 45:9	157:14 170:2	231:21 271:25
182:13 240:7	deposition 1:11	description	develop 29:8
250:20 270:17	3:14 7:6,12 9:4	3:13 28:6	developed
280:4	9:7,15 11:9	88:14,17 194:4	20:22 62:25
	12:3 16:6 37:1	descriptive	63:10,14
		104:8	100:19 182:1

183:12 184:13 186:20 232:6 265:6 developing 21:24 60:20 186:5 development 44:5,14 98:20 99:5,17,20 devin 2:3 4:23 8:3 dewatered 203:9 diagram 99:22 differ 171:13 difference 131:9,23 132:2 132:8,9,16 133:13 136:3 137:3,16 138:2 138:20 139:15 139:17 140:6 154:17 169:9 170:23 243:3 255:21 273:22 differences 138:23 241:7 241:10,14 255:20 262:3 different 24:10 26:9 30:18 34:25 69:2 96:21 99:18,19 99:21 105:24	113:24 118:13 120:23 128:6 131:16 135:4 137:9 142:18 144:4 150:20 150:25 151:10 152:16 189:23 190:15,25 191:9 193:22 194:3,10 244:16 253:17 254:1,3,12,18 254:25 255:9 272:23 274:8 differing 131:21 132:11 digits 157:25 diluting 143:24 dilution 143:14 144:23 dimensional 86:20 dinner 41:17 41:17 direct 162:7 247:13 directed 178:4 181:19 direction 287:14 directions 52:25 directly 57:22 79:6 205:23	206:18 dirty 144:5 disagree 82:17 267:2 discharge 51:25 197:23 212:5 discharged 21:12 discharges 197:10,10,12 disclose 72:7 disclosed 81:10 81:19 109:20 discovered 199:19 discrepancy 154:24 155:7 260:13 261:9 discretized 221:1 discretizing 239:19 279:7 discuss 9:20 18:19 41:23 99:4 118:23 150:5,6 184:3 235:9 discussed 40:14 74:11 109:25 149:22 171:16 181:3 184:24 198:5 271:4,21	discussing 99:2 145:10 167:23 177:16 179:18 192:8 271:19 271:23 discussion 36:21 54:22 70:20 85:21 105:7,13,22 120:9 128:16 181:13 223:12 271:16 284:13 discussions 40:24 disease 224:24 dispersion 156:24 displayed 254:2 dispose 133:15 disposed 188:10 dispute 43:9,18 distance 49:12 49:13 139:11 156:19 180:6 distinct 270:16 distributed 5:25 158:16,21 158:24 159:14 159:19 160:10 269:21 distribution 35:16 87:12
---	--	---	---

119:5 128:1 147:20 148:14 149:1 161:5 190:23 192:12 192:14 195:20 221:6,25 222:9 222:15 225:16 228:4 250:5 district 1:1,2 7:9,10 9:1,2 13:9,9 dive 85:17 divided 66:8 division 1:2 2:10 doctor 281:9,18 document 15:24 16:16 55:3,9,18 91:19 118:23 119:3,12 150:10 152:6 153:12 161:14 166:16 167:18 171:18 228:1 259:7 269:19 documented 178:11 documents 3:16 16:21 38:13 39:15 40:12 42:14 62:14 71:24 94:22 167:15	226:3 dog 115:6,8 doherty 32:7 100:16,18 doing 26:14 150:3 209:4 276:16 doj 80:12,13 84:21,22 131:17,22 136:1,16,19 275:20 282:2 doj's 136:5 280:17 don 229:8 doses 190:6 downgradient 49:7 157:4 162:9 180:11 dr 7:7 8:21 9:3 11:16 12:23 15:18 37:1 39:10 60:2 64:9 65:9 72:1 80:15,18,21 82:11,19,23 83:3,12,12,17 92:22,22,23 97:24 101:7,11 101:15,16 113:6 117:15 118:20 119:3 119:16 120:12 121:1 149:20	150:15 151:8 153:9 154:19 161:3,17 164:9 164:10 165:8 166:19,24 167:24 169:14 170:11 173:7 174:13 176:21 177:1 181:3,19 183:4 187:4 207:4 210:8 213:10 215:20 218:2 220:23 223:5 228:1,11 229:21 235:18 236:1,8,13 238:3 240:24 241:13 242:21 244:4 249:6 252:19 259:15 261:19 265:13 266:13 267:3 268:23 274:10 275:6,10 283:24 286:3 draft 42:20 66:12 146:4,8 177:15 drafted 62:5 drafting 61:11 61:12 66:4 drank 52:12 191:4	draper 104:22 drift 71:13 drill 44:6 drinking 46:22 50:9 87:12 119:6 145:14 161:5 225:5,16 226:4 227:7 228:4 drops 283:9 drought 22:25 dry 133:15,22 due 116:2 238:2 239:9 278:13 duly 8:9 287:9 dump 133:18 dynamic 239:12 278:16 dynamics 24:7 29:14 e e 3:2,12 7:2,2 24:21 86:16 e.p. 104:18,21 earlier 13:18 93:25 98:19 99:2 101:6 140:20 141:12 141:15 145:10 165:16 176:24 179:18 180:1 211:24 246:11
--	---	--	--

249:21 253:2 255:25 266:13 271:5,16 275:20 284:11 earliest 101:17 122:11 early 63:14 96:18 139:4 156:14,22 179:17 180:10 185:8 194:23 233:22 earth 5:11 22:10 58:19 207:20 209:21 easily 285:11 east 8:19 44:7 eastern 1:2 7:9 9:2 13:9 edge 181:24 182:1 edited 62:5 editions 94:11 94:15 editor 62:14 education 24:2 104:9 effect 216:7 229:14 effective 87:1 259:19 effectively 205:9	effects 130:6 169:12 171:1 171:12 224:22 227:6 effort 89:6 178:15 280:18 efforts 68:12 70:6 76:4 89:8 91:24 172:21 173:19 175:9 177:1 191:9 276:20 278:1,5 278:21 279:16 280:10,14 281:10 eigenvalues 218:22 219:13 either 27:3 51:24 66:25 67:14,17,19 68:13 69:23 70:8 136:12 182:21 202:13 elaborate 34:19 129:22 134:6 elapsed 162:2 electronically 16:23 email 16:4 emails 17:1,16 17:21 emphasis 229:10,24	emphasizes 229:12 empirical 104:22 employed 110:5 en 5:13 encapsulate 63:1 encountered 206:8 encouraging 173:1 ended 186:5 ends 119:13,25 225:22 engage 31:24 181:12 engineer 43:8 engineering 55:21 57:8,13 112:1 202:22 232:7 enjoys 177:17 ensminger 17:12 ensure 25:21 39:14 43:24 ensuring 20:11 enter 133:24 134:9 entered 47:2,11 entering 61:23 130:18	enters 21:7 entire 69:20 88:10 90:1 239:13 266:19 278:17 entitled 208:3 environment 238:23 277:17 environmental 100:15,24 epa 192:11 195:18,19,21 283:18 epidemiologi... 225:2,12 228:22 229:8,9 229:23 231:5 232:11 epidemiologist 281:8,18 epidemiology 172:20 230:18 epscor 24:21,21 25:1,1 equal 162:12 247:25 249:19 251:24 257:10 equally 36:3 89:25 equals 246:25 252:2 equation 30:22 144:15 162:4 162:19,23
--	---	--	---

245:17,19 equations 30:19,19 equivalent 148:18 error 112:4 116:13 143:3,4 172:11 173:9 235:5,6,10 240:8 243:1,11 243:13,14,17 243:21,25 244:5,8,12,20 244:23 245:6 245:15 246:7 251:9,23 252:2 252:23,24,24 253:3,4,10,12 253:21,23 254:7,9,15,16 254:21,22 255:3,5,11,13 255:23 256:3,4 256:18,20,22 257:16,18,20 258:2,3,6,7 263:24,25 280:5 284:22 284:24 errors 74:22 75:2,5 116:14 142:7 178:14 180:20 235:17 235:22 236:2,6	236:9,12,16,20 236:23 242:15 243:15 245:12 255:12 257:3,4 257:9 258:5,5 261:21 268:4 erwin 104:2 especially 117:5 174:8 essentially 102:23 104:16 established 19:21 188:7 206:14 estimate 35:8 52:4 173:23 186:10 192:13 202:21 222:14 229:11 281:20 estimated 44:12 173:3 229:16 estimates 172:23 174:8 212:4 221:22 221:24 222:3 229:25 estimating 175:3 221:5 estimation 31:9 31:12,15,18 32:4 et 145:22	evaluate 22:16 25:20 27:8 28:1 30:14,23 32:13,16 33:6 36:7 110:15 113:12 141:17 164:19 168:14 183:1 219:13 225:2 244:13 265:19,24 evaluated 32:10 183:16 183:20 246:13 evaluating 19:19 20:15,20 22:15 26:21,23 27:14 28:12 29:2 30:4 31:3 33:4,23 34:9 36:14 100:1 242:22 evaluation 28:11 106:25 107:5 110:1 164:3 165:5 eventually 21:6 evidence 47:2 116:25 117:11 118:11,15 188:8 194:6 219:3,5 220:21 230:6 279:18 exact 9:13 13:17 49:12	171:21 247:1 exactly 267:10 exam 5:13 213:18,23 examination 3:5,6,7,8 8:11 275:12 283:22 285:7 examine 234:20 250:2 examined 8:10 example 10:16 22:8,25 24:6 49:18 62:9 63:5 84:19 108:20 134:7 140:11 144:24 156:15 170:13 172:12 178:16 181:23 202:12 203:2 211:23 212:13 219:25 234:17 245:14 258:4 examples 267:19 exams 213:12 exceeded 226:5 excel 155:11 245:16,16 excellent 26:14 117:8 exceptional 83:24
--	---	---	--

exclusively 70:25	65:17 66:15,18 66:22 68:1,13	263:10 264:19 269:15,16,17	45:25 46:5,15 47:5,14,25
excuse 18:1 19:15 29:16 38:20 41:15 46:11 54:4 98:23 99:1 107:19 124:13 146:6 152:3 153:24 157:11 174:6 187:1 216:21 220:8 228:23 234:12 247:22 252:11 256:1 259:12 261:1 262:16 267:4 272:12	68:13 69:14,14 69:23,23 70:8 70:8 72:24 73:2,17 74:13 74:22,23 75:6 75:11,15,19,23 84:2,4 97:21 97:22 103:15 106:17 118:25 119:1,3,24 121:18 145:9 146:18 150:11 150:12 159:3 160:25 161:1 166:12,13,14 168:5 172:5 173:18 175:23 186:24 187:3 194:5 203:17 203:20 204:17 204:23 206:24 207:2,3 210:7 213:8,9 221:16 221:18 224:5,7 224:8,10 227:20,21,23 229:5 237:4 240:20 242:1 247:14,15 249:7 250:8 252:14 258:13 259:3,4 262:10	270:7 275:14 275:15 exhibited 35:10 exhibits 54:20 54:23 existence 14:3 14:7 expect 35:24 40:15 42:2 103:4,10 105:15 106:14 171:20 245:25 277:6 expectations 237:23 expected 174:7 256:24 262:1 experience 25:9 25:10 26:11 79:19 83:9 91:20 95:17 202:23 experienced 82:3 experiment 138:9 expert 13:7,13 17:6 18:9,15 18:22,25 19:2 19:16 24:18 25:19 43:10 44:20 45:18,22	48:5 53:22 54:7,12 56:23 57:1 60:3 61:8 72:2 80:2,6,14 80:17,20 81:2 82:3,10,21 83:11 92:25 93:18 118:20 128:11,14 153:17 154:12 181:7 194:8,9 230:18 231:5 235:18 259:12 expertise 79:22 94:23 128:18 129:10 149:6 232:13,13 experts 83:19 131:18,22 132:12 136:1 165:15,21 176:18 185:19 189:1,11 196:10 explain 35:5 43:20 61:13 71:15 160:6 217:15,21 256:25 260:12 explained 180:1

explaining 99:18 163:18	194:20	171:12 178:6	families 173:2
explicitly 128:23 129:17 148:3	extensively 190:19	180:15 197:25 218:15 268:17 273:23	family 225:9,18 227:5
explore 170:1	extent 10:9	factor 107:17	family's 226:9
explored 216:9	162:10 276:22	135:5 277:16	far 49:9 81:15 82:8 122:1
exploring 209:19	extract 44:16	278:10 280:1	133:20 138:8
exposed 52:18 193:12 229:13	extreme 240:12	factors 31:2 32:12 33:22 34:12 221:25 239:10 278:13	156:21 229:16 250:2
exposure 5:5 87:22 136:4 137:3,16 173:3 189:25 190:6 225:11 227:3,6 229:13,14,15 230:13,24 231:22 281:20 281:21	extremely 105:17 115:16 251:25	facts 77:19,23	farther 178:17
exposures 225:4	f	fair 12:1 58:9 61:3 64:5 66:10 98:11 110:15 125:20 130:14 210:10 212:23	fashion 97:2 118:7 206:2
expressed 267:3,5	f 3:20 4:25 37:9 37:24 54:19 69:4 85:4,10 86:10 88:4,5 88:16 89:23 110:21 111:6 161:9 163:24 178:12 221:12 221:18	fairly 31:7,11 52:6	fate 3:21 5:1 58:3,11 87:11 119:5 161:4,9 225:15 228:3
expression 210:15	f12 37:25	falsely 180:14	faye 17:9 151:7 154:18 163:10
extended 116:6 116:20 242:9 242:12 268:19 273:2,3,7	f2 162:3	familiar 90:5 92:14,25 93:17 94:5 99:25 100:16 120:11 128:15 154:13 166:1 168:24 176:25 185:6 205:19 207:6 213:17 259:15 259:17	fe 46:17
extending 273:5	f27 221:15,21	familiarity 192:20	features 35:9 70:21
extensive 31:6 177:21 190:12	f28 161:18,23		featuring 25:2 154:2,5 241:3
	f34 38:1		february 1:12 4:22 7:1,5 124:10,21 157:19 287:20 288:2
	f43 38:4		federal 16:18 72:5
	f7 162:6		feedback 19:24 20:11 25:20 26:17 202:24
	f8 162:6		
	facility 46:7,16 46:20 48:13 49:7		
	fact 116:18 157:1 160:9		

feel 94:25 230:19	finally 77:14 124:3 125:21 271:15	fit 214:22 215:5 215:15 216:2 216:17,25 234:24 235:1 242:16,22 244:13,17 246:13 249:24 251:25 273:15 273:21,25 274:6 277:9	87:11 88:15,22 92:15 93:3 94:6 99:7,21 100:2 106:21 106:25 110:2,6 110:24 113:18 113:20 119:4 141:18 147:6 147:17 148:3 161:4 174:22 184:9 189:4,14 196:25 201:5,8 210:5 211:25 220:3 225:15 228:2 239:11 278:14
felt 87:22 90:18	find 52:9 112:2 118:14 155:11 159:4 173:2 230:6 284:15	fits 214:10 217:5,7	flowing 197:4
fetus 224:23	findings 3:19 4:21 26:4 119:10 265:4	five 57:22 73:5 140:14 172:10 174:15 257:7,8 257:14,14	flows 196:22
field 35:11 82:3 82:6,21 83:6 83:22 93:4,16 95:4 100:6 233:2,13 240:8 273:8 280:5	fine 39:16 40:9 239:23 279:11	flaw 111:20,21 112:5,16 118:11	fluctuations 116:12
fifth 170:6	finish 11:3	flawed 111:14	focus 58:10,17 89:6,16 191:21
figure 37:22,25 38:20,22,23 120:2,3,12 121:17 122:6 125:6 159:9 162:6 249:8 250:6,10 262:9 262:13 285:10	finished 15:21 120:4,22 131:14 145:13 145:23 147:2 166:19 172:8 215:23 256:12 286:7	flaws 111:11,17	focused 71:25 182:23
figured 181:6	firm 48:18	flip 75:11 166:23	follow 91:21
figures 37:18 37:18 38:19,22 62:10 109:22 120:14 172:11 241:2,8,20 254:3	first 14:18 35:6 45:22 60:6 103:23 150:10 152:25 153:22 153:24 162:24 163:3 165:12 165:14 175:20 180:12 188:4,6 193:18 235:10 237:12 257:11 263:10 264:8 275:14 277:15	flipping 99:12	followed 91:11 91:25 111:25 111:25
filed 7:8		floods 203:6	following 16:20 19:25 188:8
files 16:24 17:4 17:24 27:8 62:22 63:4,5,8		floridian 21:16	follows 8:10 177:22 241:10
final 84:11 163:6		flow 4:2,7,13 22:25 29:11 48:24 49:22 50:1 51:11,17 51:20 52:25 57:19,23 58:10 60:7 65:12 68:3 82:4,6	footnote 145:12 145:13
finalized 62:6			

foregoing 287:7,16 288:7 288:22	138:12 139:1 139:20 140:2 140:25 141:7	formed 94:22 former 60:16 173:1	framework 86:12 173:21 175:11,25
foremost 165:15	143:20 144:2 148:7 149:4	forming 95:15 96:20	frank 17:12 fresh 22:24
form 15:3 30:1 31:21 32:24 33:8 34:1,14 34:23 48:20 51:19 52:20 53:13 54:2 57:3 58:13 67:22 68:7,15 68:24 69:16,25 70:10 71:5 72:9 73:12 74:8,16 75:25 76:7 78:5,8,24 79:21 81:14,23 82:14,25 83:14 90:15 91:8 93:7,13,22 95:7 96:7 97:7 97:13 100:10 101:2 102:6 103:8 106:8 107:3,11 110:8 110:18 112:12 112:23 117:19 126:24 129:8 129:15 131:6 132:18,24 133:3 134:2,19 136:8 137:6,19	158:13 163:15 164:1,22 168:23 169:16 171:9 173:13 174:15 175:14 176:9,16 182:10 183:9 189:7,17 190:2 193:25 201:13 202:2,7 208:19 210:23 211:13 213:3 214:25 215:8,18 217:2 217:10,19 218:6 221:8 223:10,20 230:16 231:2 231:15,24 232:17,24 234:1 236:25 251:5 266:3,10 267:7,17,25 268:7 269:1,7 272:11,16	formulated 127:2 forth 42:12 287:9 fortunately 26:18 found 116:4 191:5 192:25 196:2 236:19 242:13 foundation 19:8,22 24:23 113:21 134:3 183:9 190:2 194:1 221:8 223:10,21 230:16 231:25 272:17 four 162:25 199:5 238:13 263:20 276:10 fourth 168:8 280:1 frame 138:6 170:19 186:13 189:4,14 191:25 192:3 198:4	freshwater 17:13 friend 101:20 177:9 friends 190:17 front 37:5 43:7 65:21 152:20 155:10 full 8:15 61:19 161:23 170:1 171:4 221:21 228:19 241:5 264:25 fully 10:5 220:24 239:2 277:21 fun 105:6 177:16 function 35:17 107:16 155:11 156:24 157:3 fundamental 178:14 180:20 funded 19:8 101:21 funding 24:4 further 150:6 157:25 160:20 247:8 286:3

future 5:24 23:8 29:19 269:20 fuzzy 30:12	128:15 145:4 176:17 262:5 278:4 generate 35:19 63:7 108:1 110:5 154:10 159:13 generated 20:3 154:15 182:19 183:3 190:5 241:1 generating 201:23 209:11 281:14 geochemical 173:25 geologic 86:12 geometric 235:7 246:12 247:8,24 248:5 248:8,18,23 273:11,22 282:3,6,21,24 283:1,2,25 284:17,21 285:9,12 geometry 180:17 geophysical 207:12 george 104:18 104:21 185:21 georgia 183:3	geotechnical 57:13 getting 88:11 177:17,17 221:17 giovanni 2:9 7:20 8:22 giovanni.ant... 2:13 give 12:12 19:24 26:8 57:20 159:4 193:3 259:10 given 11:10 52:25 61:18 73:23 140:18 160:7 212:20 214:11 270:19 274:12 gives 36:1 giving 217:25 gms 61:24 62:17,24 63:4 63:6,8,11 245:9 go 13:1 26:23 34:25 91:15 115:7 131:7 175:24 178:17 195:17,23 198:7 202:12 209:16 233:8 236:3,9 238:8 275:14 277:15	goal 210:11 goes 227:11 273:23 going 7:4 15:15 28:21 39:11,21 40:7 54:4,17 55:2 59:5,7,19 64:11 97:20 101:23 102:12 118:24 150:10 160:24 166:12 179:6 199:24 211:4 213:7 227:19 228:14 240:20 242:1 258:13 259:2 262:10 264:8 267:9 269:15 276:12 gold 143:6 golly 206:10 good 7:3 8:13 8:14,21 11:7 13:3,4 19:25 20:1,11,12 25:11,21 31:23 83:22 87:22 91:12,12,25 96:23 101:4,19 111:25 114:22 116:15 142:10 150:3 171:20 177:9 214:22 215:5,15 219:2
g			
g 7:2 86:20 124:5 188:13 191:25 199:6 gained 52:5 197:4 gap 124:11 125:5 139:5 gaps 208:3 gather 52:8 gauge 197:1,2 gauges 52:3 general 14:4 25:9 28:6 30:5 31:19 35:1,5 42:10 91:9 94:22 96:11,25 108:15 125:10 173:21 175:10 175:25 200:15 210:19 211:17 213:6 217:24 230:4 267:11 271:22 273:9 278:22 279:17 280:12 general's 7:13 generally 16:10 31:17,22 83:22			

220:20 242:16 282:14 goodness 234:24 249:23 goods 235:1 gotcha 229:3 gotten 53:7 governing 30:19,21 grab 224:12 grace 188:12 gradients 239:25 279:13 graduate 60:16 95:19 98:3,13 186:4 grams 121:9,12 grand 108:19 grant 19:21 24:20 25:1,1 101:7,22 graph 120:17 121:7 138:16 204:1 249:11 250:10 graphical 63:2 graphics 108:2 graphs 151:20 152:17 155:12 156:2 great 11:8,15 49:11 65:6 149:10 253:18	greater 171:23 178:18 247:5 261:23 262:25 283:8 greatest 114:21 green 124:4,12 124:24 125:5 125:21 grid 277:4 grids 239:20,22 279:8,10 grills 9:17 ground 9:21 52:1 133:18,23 134:11,23,25 135:9,14 groundwater 4:17 5:10 14:8 15:13 20:18,19 20:20,23 21:23 22:23 23:1,5,6 24:11 25:10 26:24 27:15 29:11,12,19 32:21 33:5 34:10 44:5,14 44:22 46:6 49:1 52:25 57:19,23,25,25 58:10 60:21 61:1 68:3 76:4 79:19 82:4,6 83:6,19,23 86:17 87:1,11	92:15,24 93:3 93:5,17,18 94:6,23 95:5 95:10,16,20 96:11,19,24 98:3,13 100:2 100:7,25 102:18,24 103:1,5 105:24 106:21 110:2,6 110:24 119:4 134:22 145:14 161:4 165:25 173:20 175:9 176:4 183:15 184:9 185:12 186:5,8 189:1 189:4,11,14,21 190:5 192:22 198:21 200:14 200:19 201:4 201:23 205:18 205:21 207:19 208:24,25 209:7,8 210:4 211:21 212:18 213:16 218:19 225:15 228:2 239:4,11 245:8 272:19 276:23 277:23 278:5 278:14 280:14 group 13:6,20 60:9 281:21	guarantee 33:14 guess 27:20 40:22 41:22 61:13 102:22 134:15 guessed 16:13 guidelines 100:1 193:2
h			
h 3:12 87:1 92:17 191:25 199:6 habit 177:10 hadnot 89:9,21 90:2,13,22 91:5,23 92:7 92:11 271:8 272:23 half 9:14 108:22 162:20 162:23 halfway 251:17 hand 55:2 59:19 64:11 162:15 227:19 248:16 250:12 250:15 handed 59:25 handing 207:2 handwritten 38:7			

hang 226:11	226:9 227:6	heterogeneity	47:14,15,16
happen 134:13	281:7	238:24 277:18	60:19 88:2,7
happened	healtheffects	hey 117:11	histogram
24:25 173:22	166:17	150:3	159:13
175:11 184:7	hear 12:4	hi 115:5,8	historical
happens 23:9	heard 8:23 14:1	high 24:5	105:18 114:5
114:24	14:2,3,6 15:7	114:14,16	119:8 161:8
happy 69:6	15:11 92:18	116:12 134:8	173:19,25
70:13	hearing 43:6	140:13 142:12	175:8 176:3
harbaugh	heavens 56:22	160:8 174:3	184:13,17,21
100:3	held 7:12 54:22	203:5 250:19	200:18 223:24
hard 15:10	help 11:19	252:1 264:16	225:14 226:2
203:2 206:17	26:10 31:25	273:25 277:1	228:6
harmful 224:22	200:25 202:25	282:19	history 44:13
haroon 2:9	203:12 209:5	higher 139:10	44:15 209:11
7:24	221:12 222:8	144:25 160:19	holcomb 89:9
haroon.anwar	227:12	163:12 262:6	89:21 90:2
2:13	helped 62:12	highest 125:11	91:5,23 92:7
harr 188:24	helpful 40:4	125:15,19	92:11 271:8
harvard 186:15	88:11 95:15	highlighted	272:23
havai 2:19	100:12 197:16	235:17	hold 66:17,21
hayne 86:13	201:10,23	highlights	68:3
222:2	237:13 238:9	38:10 39:5	home 145:16
head 10:18	276:4	highly 26:17	145:20 146:15
51:10,16,20	helps 159:7	134:10 140:16	homes 127:20
80:11 113:18	hennet 80:18	155:20 169:10	honestly 12:21
115:9 246:10	hereinafter	170:24 191:11	horan 2:17
268:9 284:25	145:23	hindcasting	hour 9:15
heading 73:3	hesitant 71:8	178:17 184:3,5	58:25 162:8
75:16 237:7	hesitate 12:24	184:10,15,18	hours 41:21
heads 49:22,25	heterogeneities	184:21 200:23	houses 195:23
212:14 216:3	142:8 240:1	201:11	housing 225:10
health 46:23	279:14	hired 13:12,19	225:18
194:25 225:1		46:14 47:3,8	

huh 104:5 168:11 256:17 259:24 human 225:1 hundreds 94:21 hunt 94:8 95:3 hydraulic 202:11,17 212:14 238:25 277:19 hydrogeologic 113:1 186:1 hydrological 270:15 hydrology 6:2 269:22 hypothetical 112:12 131:6 133:20 134:2 hypothetically 130:25 132:10	161:1 166:13 166:14 186:24 187:3 207:3 213:9 227:20 227:21 259:3,4 269:17 identified 236:2,9 ignore 132:11 illnesses 195:8 imagine 44:15 immediately 133:25 134:4 impact 44:25 131:1 132:22 135:13 140:9 142:7 151:14 181:16 194:25 impacts 265:9 impaired 12:16 implicitly 129:19 130:5 implies 179:21 important 10:15 37:20 88:3,6 180:2 277:10 impossible 220:24 impressive 26:13 83:9 improperly 133:16	inaccurate 282:15 inadequate 174:5 inches 261:4 incidents 191:2 196:1 include 68:2 77:19 84:15,19 84:20 108:16 109:10 128:23 148:12 235:4 238:13 270:16 273:24 included 69:7 84:25 85:17 107:22 111:17 111:22 235:21 includes 65:2 76:13,19 108:10 130:5 225:7 including 16:22 17:7 87:20 190:20 281:7 inclusive 56:17 109:8 248:17 incomplete 67:20 112:12 131:6 134:2 205:8 206:5,13 inconsistent 76:10	incorporate 220:25 incorporated 232:11 incorporates 62:18 incorrect 67:1 67:14 75:8 77:1 235:22,23 267:15,22 increase 245:1 250:25 251:7 252:3 increases 155:14 independent 47:14 83:7 165:4 independently 265:18 indian 50:18 indicate 162:6 177:24 249:3 250:19 273:24 indicated 247:25 249:21 253:2,11,12 indicates 159:17 169:10 170:8,15,23 244:5,8 246:20 246:25 247:5 250:25 251:7
i			
ideally 200:21 200:24 202:3 identification 15:16,17 54:20 54:24 55:4,6 59:20,22 60:1 64:12,14 65:10 97:20,22 118:24 119:1 150:12 160:25			

indicating 242:16 246:4 251:24 252:3 257:10 indirect 206:19 individual 100:19 142:1 143:4 144:20 144:21 230:14 231:22 237:22 255:12,17 256:5 257:24 281:20 individual's 189:24 individually 276:13 individuals 17:19 18:3 52:12,17 193:11 229:13 230:25 industrial 199:5 inevitable 149:2 infant 225:3 infer 202:17 209:22 inferring 56:12 infinite 211:9 212:21 influenced 79:10,17	influences 270:19 inform 201:2 203:1 information 16:23 36:23 49:18,21 77:20 77:24 187:10 202:4 208:10 208:16 213:23 272:8,14 274:16 informative 95:9,13 97:4 informed 193:2 ingested 63:8 inherent 205:6 205:14 inherently 128:23 238:23 277:17 initial 60:2 63:17,20 64:6 64:17,22 66:5 66:18 67:10 68:1 70:12 72:24 73:16 75:3,7 76:13 76:20 77:12,13 81:9 84:8 115:3 116:23 117:5 163:2 190:7 204:18 220:5 222:3	233:21 235:13 236:7 237:3 243:21 244:1 245:19 246:2 250:15 251:1,8 257:21 258:12 260:3,22 261:20 inject 202:14 innovative 22:5 input 62:22 63:4 174:1 212:24 214:5 233:9 236:16 236:19,22 265:14,25 266:7 inputs 273:3 insensitive 140:17,17 155:20 insidious 103:24 instance 267:21 277:8 instances 35:20 institute 183:4 institution 176:14 institutions 182:2 instruct 197:25 instructed 12:6	instructions 188:20 instructive 96:10 97:4,9 97:17,18 integral 62:9 62:11 intelligently 209:22 intend 12:18 69:10,12,21 intended 228:20 229:6 inter 44:13 interact 51:24 186:16 intercom 115:5 interest 91:1 interested 43:4 154:16 185:9 185:17 194:19 interface 63:2,4 intermediate 84:7 interpretive 105:18 interrupt 10:25 11:5 interval 36:10 70:23 intervals 208:7 introduce 213:8
--	---	---	--

invalidate 230:7 inverse 134:15 investigate 261:11 investigated 14:17 investigator 24:25 25:6,16 101:12 investigators 19:9 32:18 101:21 invoices 269:3 involve 28:12 involved 40:23 40:24 45:16 46:5 50:15 99:19 102:12 185:20,22 186:17 196:11 involvement 181:8 involves 19:10 142:18 involving 45:19 46:6 irregular 208:6 issue 15:13 128:17 177:11 177:15 179:11 194:13 208:24 228:20 229:6 280:12	issued 16:7 235:11 issues 5:8 14:5 14:19 15:1 177:16 195:4 italicized 188:3 items 99:21 iteration 56:8 j j 2:3 145:22 146:3,4,9 j.j. 104:6 jacob 92:16 jang 172:12 january 4:3,14 37:11 81:19 121:20,25 122:18 123:9 124:1,10,21 125:2,2,7,8 136:18 137:22 137:24 170:14 269:9 jason 17:10 jay 80:21 jeff 37:10 41:5 42:23 107:12 jeffrey 2:20 60:10 jerry 17:12 job 114:22 116:15 117:8 150:4 175:2	220:20 john 32:6 100:16,18 jones 1:11 3:4 3:17 4:6 7:7 8:8,16,21 9:3 11:16 12:23 15:18 37:1 39:10 55:19 60:2,10 64:9 65:9,20 72:1 97:24 117:15 119:3,16 120:12 121:1 149:20 150:15 153:9 161:3,17 164:9,10 165:8 166:19,24 167:24 169:14 170:11 173:7 174:13 187:4 207:4 210:8 213:10 215:20 218:2 220:23 223:5 228:1,11 229:21 238:3 240:24 241:13 242:21 244:4 249:6 252:19 259:15 261:19 265:13 266:13 267:3 268:23 269:25 274:10 275:6,10	283:24 286:3 288:6,21,25 journal 26:5 104:8 165:25 191:7 judge 188:20 judgment 202:23 220:2 july 136:20 137:24 162:1 jumped 266:25 june 136:20 jury 188:20 justice 2:10 8:24 43:1 165:15 k k 24:4 kailey 2:8 7:22 kailey.silvers... 2:12 keep 59:5,7 210:11 kevin 13:23 key 5:13 kind 27:11,23 53:6 56:19 87:18 91:1 105:14 108:16 137:23 143:17 kinds 24:10 25:25 26:10 51:15 190:15
---	---	--	--

knew 185:19 know 11:23 14:14 15:10 21:17 23:20 24:1 25:12 26:7,11 30:16 31:8 32:9 48:3 48:13 49:14,17 49:21,25 50:5 50:24 51:6,12 52:15,22 55:8 60:14 82:8 83:4,5 85:20 89:3,5 92:23 108:19 115:24 119:16 122:1 128:5,9,13 130:9,12 131:16 133:16 135:11 139:13 146:11 147:12 147:14 150:15 165:19 178:10 190:5,10,14 192:3,15,16,21 194:21 198:25 199:15,17 200:4 203:6 213:22 220:5,6 221:10 246:7 269:5 281:5 282:6,14 288:8 knowing 14:16 181:8	knowledge 79:22 194:16 210:6 known 92:24 93:18 179:7,7 konikow 80:7 83:12,17 I I 1:11 2:11 3:4 3:17 4:6 8:8 55:19 60:10 65:20 288:6,21 288:25 labeled 122:7 122:21 123:12 154:6 labor 66:8 laboratory 60:20 lack 206:2 lake 1:15 7:14 287:2 288:5 land 188:11 landholder 44:19,20 45:21 large 21:19 23:3 31:12 35:19 44:8 57:23 62:23 113:18 246:4,4 246:5 larger 139:5 261:20 262:1,2	largest 44:13 44:14 155:6 largin 2:15 7:15 larsen 1:16 7:16 287:4,23 288:2 las 43:22 44:2,9 late 123:15 155:14 156:9 194:22 233:23 latest 124:14 launch 63:6 launching 105:7 laura 2:3 8:1 law 186:15 laws 288:21,22 lawsuit 9:12 45:10 52:11 199:13 layer 163:5 240:10 252:22 262:13 280:7 laymen's 43:20 lbaughman 2:6 lead 48:8 133:12 leadership 13:6 leads 105:12 173:4 leak 51:25 leaked 52:24	leaking 130:22 learned 14:19 14:25 learning 5:12 24:10 58:20 185:10 207:20 208:11 209:1 209:19 210:3 leaves 157:7 197:20 lecture 98:2,12 99:14,16 105:2 105:5 leeches 46:18 left 56:14 60:24 152:2,7,11 226:17 250:15 legal 13:20 40:14,17 41:7 41:13 60:9 70:2 164:7 265:16 266:8 271:12 legend 151:25 152:7,8,11 lejeune 1:4 5:7 7:8 8:25 13:7 14:1,20 15:7 17:5,20,25 18:2 43:1 68:5 68:12 70:7 76:4 119:8 120:8 161:7 167:2 173:1,1
---	--	--	--

183:7 199:18 203:24 225:5 225:10 227:8 228:6 276:19 278:1,20 279:16,19 280:10,23 288:1 length 171:16 leonard 80:7 83:12 letter 4:22 5:17 123:24 228:9 letters 17:2,17 17:22 leukemia 185:14 191:2 196:2 level 5:10 51:22 102:17,20 127:19 140:14 160:15 192:20 198:5,17 201:6 206:20 207:19 208:24 211:1,1 212:3 218:8,25 226:6 229:12 229:14,15 277:9 283:16 levels 162:5 196:20 197:8 209:13 218:14 220:8 230:13 230:24 231:21	license 1:17,17 287:23,24 life 108:22 likely 36:17 191:23 likewise 154:4 limit 238:4 239:22 264:4 264:12 279:10 limitation 279:22 limitations 61:18 238:15 239:18 279:5 279:21 limited 16:22 17:7 224:23 225:10 276:19 limits 279:20 line 122:7,10 122:15,21 123:6,12,23,24 124:4,12,24 125:5,11,14,18 125:22 151:3,3 234:22 249:17 250:3 288:10 lined 46:19 49:4 lines 60:9 160:20 list 18:20 23:18 54:11 57:14 64:4,7,16	70:18 72:7,13 72:15 73:5,9 73:18,21,25 74:4 75:18,21 76:5,10 77:11 77:12,14,19 78:13 84:4,8 84:12,20,25 85:3 89:15 96:3 146:22 190:6 238:8 241:19 269:24 listed 56:20 77:24 95:21 276:10 278:11 279:4 280:2 listing 96:14 lists 77:7,25 78:7 liter 122:17 123:8,25 125:1 155:4 157:24 162:2 170:17 170:20 172:14 172:14,15,16 226:7,8 243:22 244:2,23 245:2 249:12,14 251:24 252:3 253:11,13,22 253:23 254:8,9 263:1 283:9,12 literature 162:21 183:24	222:5,19 litigation 1:4 7:8 8:25 13:8 43:1 45:17 53:23,25 54:8 57:1 119:19 146:5 196:11 288:1 little 22:12 87:15 139:14 144:4 153:5 172:2 179:18 179:22 208:12 212:6 229:10 229:24 234:2 lived 46:16 lives 162:20,23 loading 121:8 121:12,19,24 122:3 136:5,14 137:1,13 235:22 local 142:8 located 162:7 location 1:14 50:6,10 53:3 142:5 243:3 278:25 locations 113:25 285:15 log 155:16,16 155:23,23,24 155:25 158:16 158:21,24
--	--	--	--

159:14,18,23 160:9 logarithmic 156:3 160:1,5 logic 163:18 logical 178:14 180:20 long 28:17 29:11 41:19 43:24 45:4 48:12 162:14 198:18 205:9 209:15 233:19 longer 134:21 look 15:19 21:25 28:16 31:3 33:22 34:12 35:12,14 40:3 52:2 84:3 114:11 116:4 116:18 123:12 138:15 154:12 166:18 178:23 184:6 188:2 198:7 204:20 208:2 213:25 218:23 253:8 253:20 254:4 254:14,20 255:2 256:10 258:12 259:22 260:2,5,16,21 262:12 263:9 263:17 283:6	looked 24:9 85:20 151:14 179:15 192:23 192:24 193:18 216:7 looking 20:19 20:20 22:4 23:23 26:1 34:11 36:7 39:14 60:6 76:16 121:17 140:15 151:21 155:12 156:22 157:18 159:5 166:19 168:7 205:20 221:20 225:24 226:11 226:24 228:18 237:6,11,22 242:3,6 249:10 250:11 251:12 252:18 262:14 264:7,25 270:9 looks 55:18 65:19 98:6 99:13 122:19 123:18 124:17 157:22 163:16 204:1,13 207:6 213:12 225:25 259:17 lori 17:13 losses 129:5 148:13,25	lost 52:5 147:19 lot 15:10 24:3 42:7 62:1,12 62:24 177:16 178:3 185:19 186:16 190:15 191:7,9 louisiana 19:11 21:20,20 28:7 28:16 29:10 30:10 lovell 8:16 low 23:1 134:16,16 139:7 142:14 203:8 lower 114:15 145:4 160:14 273:12 283:3 lowest 125:22 lucius 162:22 lunch 149:9,13 luxenberg 2:4 m machine 5:12 24:9 58:19 207:20 208:11 208:25 209:19 210:3 made 12:8 63:24 66:15 67:7 138:1	166:2 178:13 179:24 219:14 241:15 267:22 288:19 magnitude 111:19 139:17 139:22,24 159:1 197:5 main 1:15 maintain 229:15 major 118:11 138:23 201:15 majority 130:13 138:6 138:20 140:12 make 11:11 19:25 20:8 23:2 25:10 26:3 27:5 38:7 38:10 39:2,5 42:5 96:2 131:22 132:2,7 132:16 137:2 137:15 141:9 151:21 173:5 174:24 198:11 208:12 215:10 219:21 makes 16:19 131:8 132:9 136:2 220:14 making 20:1
--	---	--	---

manageable 210:12	213:9 227:19 227:21 259:4	280:8	md 281:17
management 105:25	269:17	matched 114:17 115:14	md3dms 62:18
managers 209:6,25	martel 17:11	143:8,9	mean 29:16
manner 193:1	mary 94:7	matches 258:8	36:21 56:5
manual 31:15 31:18,23	maslia 2:20 17:9 18:6,8,25	material 24:6 28:9	67:4,4 68:9
manufactures 9:17	19:5,16 80:6 81:2,5 82:1	materials 16:22 60:3 64:4,6,16	74:7 78:6,25
manuscripts 177:15	113:6 118:20 138:14 167:16	65:25 77:7,11 77:13,14,18,24	93:8 95:13
maps 38:25 62:10	281:22	78:12 79:5 84:3,7,11,13,16	96:9 102:19,21
marine 68:4 119:7 120:7	maslia's 81:12 81:18 107:22	84:23 89:14 134:11,17	107:4 127:2
161:6 203:23 228:5	109:23 132:4 138:10	147:4,12 186:19	128:5 150:1
marines 173:2	mass 86:21 121:8,12,19,24	math 158:9	154:21 158:20
mark 65:1 97:20 118:24	122:2 136:5,14 137:1,12 147:4	mathematical 30:15 180:16	171:11 182:14
150:11 160:24 166:12 259:2	147:8,13 148:22 162:9	212:12	184:5 205:13
marked 15:15 15:17 40:7	162:11 235:22 271:25	matter 7:7 17:7 85:15,23 89:5	206:4 214:17
54:19,23 55:4 55:6 56:20	massachusetts 185:7	180:8,8	217:22 226:9
59:20,22 60:1 64:12,14 65:9	master's 57:7 57:11	maximum 122:12 226:5,7	235:5,5 243:14
97:22 119:1 150:12 161:1	masters 147:8	283:15,16	243:17,21,25
166:14 186:23 187:3 207:3	match 142:11 171:21 237:16	mcalf 5:20 258:24 260:10	244:4,8,12,19
	238:10 240:11 258:2,7 276:7	260:24	244:23 245:5
	276:17 277:7	mckayla 2:15 7:15	246:7 251:9,23
		mcl 140:14 226:6 283:14	252:2,23,23,24
			253:3,4,10,12
			253:21,22
			254:7,8,15,15
			254:21,21
			255:3,5,11,13
			255:18,23
			256:2,3,18,20
			257:9,14,16,17
			257:19 258:2,2
			258:6,7 265:22
			268:11 280:24
			281:5,19
			284:21,23

meaning 95:14 116:15 means 43:21 114:20 155:24 158:22,25 214:9 216:9 meant 103:12 105:21 109:12 148:9 177:12 measure 145:1 196:24 205:23 206:18 218:24 244:17 measured 50:8 114:12 115:19 141:23 142:16 196:19,25 197:6 200:4 209:13 229:17 240:14 measurement 238:16 240:5,8 280:2,5,13 measurements 51:22 170:14 209:17,18 212:4 225:11 media 7:6 59:16 149:17 223:3 medical 281:8 281:18 medication 12:19	meet 41:13 meeting 41:7 41:20,24 207:12,13 meetings 41:4 42:14 melt 135:6 member 18:15 60:19 members 25:13 62:11 memory 12:15 28:22 29:4 30:12 mention 185:4 mentioned 19:4 19:14 20:10 21:14 22:14 25:18 26:15,20 30:3 39:8 43:3 43:17 45:8,20 48:23 52:11 62:16 81:1 101:6 140:21 141:15 166:25 173:9 176:24 177:8 181:18 196:5 206:17 211:24 246:11 266:14,18 mentions 57:7 merit 287:5 merits 194:11	messages 17:2 17:17,22 met 41:15 method 198:3 257:21 methodologies 26:5 methodology 26:9,21,24 27:15 32:22 33:5 34:10,15 40:16 265:6 methods 22:6 87:23 111:24 206:19 metric 244:13 metrics 235:10 micrograms 122:16 123:8 123:25 124:25 155:3 157:24 162:1 170:17 170:19 172:13 172:14,15,16 226:6,8 243:22 244:1,23 245:2 249:12,14 251:24 252:2 253:11,13,22 253:23 254:8,9 262:25 283:9 283:11 microphone 59:24	microsoft 245:16 mid 179:2 middle 151:3 151:25 249:17 migrate 195:1 migrated 46:20 migrates 162:9 migration 46:25 114:8 162:11 205:10 222:1 230:5 237:15 276:6 276:15 mike 17:12 miles 44:8 million 25:1 mine 25:7 46:4 60:17 177:9 minimum 123:17,19 124:15,19,19 162:19 283:13 mining 110:4 110:11,16 minor 138:19 140:7 241:9,16 minus 243:7 minute 57:21 misconceptio... 172:19 misleading 173:4
---	--	--	--

misleadingly	103:5,10	164:19,25	218:3,7,10,13
256:7	104:23 105:16	165:1,10,18	218:20,21
missing 209:22	106:14,22	166:3,8 168:2	219:3,14,22
mississippi	107:1,15 108:6	168:14 169:11	220:1,3,4,15,19
19:12 21:18	110:2,6,23,25	170:18,25	220:22 221:2
misunderstan...	111:5,8,12	174:23,25	222:4,16 223:7
252:11	112:6,17,25	175:4 176:5	223:19 230:3,8
mixed 143:1	113:3,7,13,15	178:5,17,20,23	230:11,12,23
145:3 147:25	113:16,20,21	179:12 180:10	231:20,20
mixing 143:24	113:23 114:22	182:16 184:6	232:2,4,6
144:14,22	114:25 115:12	184:22 186:21	233:1,12
147:5,16 148:2	116:15 117:1,5	190:13,23	234:19 236:16
148:22	117:13,17,21	192:22,23,23	236:19,22
mixture 148:18	117:23 118:1,3	192:25 193:2,4	237:24 238:15
model 4:2,8,13	118:8,12	193:5 195:13	239:3,18
21:19 27:21	120:19 121:16	195:19,20	240:11 242:13
28:2,4,7,8,10	121:23 122:25	196:13 197:2,8	243:4,9,11
28:12,13,16	123:3,7 126:12	198:8,10,11	244:5,9 246:12
29:9 30:10,10	126:20 127:13	199:9 200:19	246:20 247:6,8
30:14,15,22,24	128:19,22,24	200:23 201:5,9	247:25 248:5,6
31:13,25 32:9	129:12,12,17	201:11,24	248:8,18,23
32:21 33:15	129:19,24	203:4,14,21	249:3,24
34:4,10 35:7,8	130:1,7,16	204:2 205:9,25	252:12,22
35:9,20,21	131:19 133:11	206:9 210:5,11	262:13,16
36:15,16,19	135:16 140:16	210:21,25	264:15 265:5
37:3 38:1	140:21 141:19	211:2,3,10,11	265:14,25
46:25 47:7	143:8,9 147:5	211:22 212:10	266:7 270:20
49:19 52:16	147:7,13	212:20,24	270:23 271:4,8
57:23 60:8	148:11,17,23	214:3,5,10,13	271:25 273:3,7
61:25 62:11	150:18 151:5	214:15,16,20	273:11,15
65:12 87:10	151:13 152:19	214:20,21	274:6 277:3,22
88:15,19,23	155:19 156:16	215:3,5,13,15	278:8,24 279:5
92:8 98:20	156:25 163:4	216:1,17,17,24	279:21 280:8
99:4,17,19	163:20 164:11	216:24 217:4	280:20,22

281:14 283:5 283:25 284:17 284:21 model's 33:5 239:23 271:17 273:11 279:10 modeled 49:15 modeler 219:21 279:2 modeler's 210:11 modelers 48:8 51:16 189:21 190:5 199:12 212:16 281:5 modeling 4:18 5:18 26:24 27:8,15,24 44:24 47:22 52:7 57:19 58:3,10,11 60:21 61:2,23 68:11 69:3 70:6 76:4 79:20 82:4,7 83:6,20,23 88:10 89:8 91:24 92:15 93:2,5 94:6,24 95:5,11,16,20 96:12,20,22,24 98:3,13 100:7 100:25 105:23 108:20 167:2	168:12 172:21 177:1 178:6,15 183:15 186:5 189:1,11 191:9 192:12 194:8,8 194:9 198:21 200:15 203:11 205:18 208:25 211:6,21 212:18 213:16 225:13 228:9 228:21 229:7 234:14 245:8 272:19 276:20 276:23,25 277:12 278:1,5 278:21 279:16 279:20,23 280:14,18 281:9,13,23 282:18 284:6,7 284:9 models 6:1 20:23 21:23 28:5 30:3,5,8 33:20,21 36:2 36:3 68:4 92:4 96:21 100:2,15 100:24 102:18 102:24 103:1 103:25 104:15 104:16 105:10 105:17,25 106:2,5 107:14	107:25 112:7 112:18 113:12 155:20 173:5 173:20,23 174:6 175:10 182:1 184:10 184:10 186:8 186:10 194:10 200:10 205:21 206:22 214:17 216:10,12 219:11 269:21 270:16,18 273:5 280:22 modflow 30:17 30:20 46:24 61:24 62:18,21 62:22 63:6 88:15 113:11 178:8 182:4,13 182:24 197:8 237:16 239:18 276:7,16 277:12 278:6 279:6,24 modified 63:5 74:12,18 modify 63:3 moment 15:19 62:16 92:2 166:10 monday 41:15 monitoring 22:9 113:25	170:8 200:7 208:5,8 220:18 242:14 252:22 montana 46:4 47:24 48:11 53:21 54:6 monte 36:11 70:22 175:4 month 13:18 109:17 137:23 153:2 233:24 234:3 monthly 147:1 153:1 280:24 281:6,19 months 45:14 morning 7:4 8:13,14,21 morris 2:20 17:9 18:6,15 80:6 81:2,5 107:22 108:2 110:10 118:19 132:3 167:16 177:23 281:22 mothers 191:4 227:15 move 54:16 129:2 movement 192:13 moves 239:4 277:23
---	---	--	--

moving 30:13 mt3d 46:25 63:7 113:12 182:4,14 mt3dms 38:1 61:24 62:22,23 135:16 151:23 163:4 178:9 222:4 237:16 239:19 242:12 276:7,16,25 277:12 278:6 279:6,24 mt3ds 182:24 multiphase 86:21 multiple 28:5 30:3 143:22 206:21 207:21 212:24 214:5 multispecies 86:21 municipal 185:13 199:20 mustafa 42:20 80:7 82:11	narrow 179:16 179:25 180:3 180:15 203:12 narrowed 139:11 narrowing 157:10 national 19:7 19:22 24:22 176:10,12 native 259:6 natural 180:16 nature 9:9 10:2 191:6,7 197:17 211:5 navy 166:2 navy's 5:16 228:8 nc 5:20 near 185:7 necessarily 33:16 70:15 84:18 215:19 271:2 necessary 42:6 281:4 285:17 need 74:4 76:23 169:25 201:5 212:17 217:15 217:21 238:4 needed 43:23 206:10 210:18 needs 67:1,17 77:4 94:25	nefarious 103:24 negative 243:13 244:4 244:20 253:21 254:7,15 255:3 256:18 257:3,7 257:7 258:5 neighborhood 46:21 185:16 neighborhoods 190:25 191:3 neighbors 193:22 195:22 nervous 217:25 net 192:11 195:18,19,21 nevada 1:17 43:7 44:1,7 287:24 never 14:16 68:18 103:4 105:15 133:16 146:3 206:7 212:19 new 2:5,5 5:20 68:22 118:8,23 198:21 241:1 258:24 260:10 260:24 273:3,8 newly 117:17 118:3 night 41:17,18	noaa 101:21 nodding 10:17 non 16:21 160:17 214:4 215:21 268:4 nonunique 168:17 214:17 214:18 218:3 219:11 nonuniqueness 211:20 218:9 219:6 norm 40:2 150:3 256:12 269:25 normal 160:18 normally 51:16 158:16,21,24 159:14,18 160:9 norman 1:11 3:4,17 4:6 7:7 8:8,16 55:19 60:10 65:20 104:22 288:6 288:21,25 north 1:2 7:10 8:19 9:2 13:10 119:8 120:8 161:7 203:24 228:6 northern 46:17 notary 1:18
n			
n 3:2 7:2 name 7:15 8:15 8:22 48:7 72:16 80:8 153:12 287:20			

note 111:11	259:8,14	110:17 112:11	48:19 51:18
noted 111:16	263:11,12	112:22 117:18	52:19 53:12
112:5,16 288:8	282:2 283:12	126:23 129:7	57:2 58:12
notes 37:13	numbers	129:14 131:5	67:21 68:6,14
38:8 39:2 98:2	119:20 154:10	132:17,23	68:23 69:15,24
98:12 287:18	160:4 173:8	133:3 134:1,18	70:9 71:4 72:8
notice 3:14	250:19 253:16	136:7 137:5,18	73:11 75:24
16:6 214:12	253:25 254:11	138:11,25	76:6 78:4,14
noticed 59:24	254:17,24	139:19 140:1	81:22 82:24
nrc 165:20	255:8 257:12	140:24 141:6	83:13 90:14
166:25 176:7	262:2 275:22	143:19 144:1	91:7 93:6,12
176:13	numerals	148:6 149:3	93:21 95:6
nrc's 167:1	204:21 241:25	158:12 163:14	96:6 97:6,12
number 7:11	numerical 22:5	163:25 164:21	190:1 215:17
17:1 19:12	139:21,24	168:22 169:15	223:9,20 231:9
35:20 36:2	140:6 218:15	171:8 173:12	231:24,25
48:6 57:24	239:20 279:7	174:14 175:13	232:16,23
59:16 119:14	numerous	176:8,15 182:9	233:25 236:24
119:15,25	270:16 280:17	183:8 189:6,16	266:2,9 267:6
123:17 145:11	nw 2:11	193:25 201:12	267:16,24
146:5,19,23	o	202:1,6 208:18	268:6,25
149:17 153:11	o 7:2 24:21	210:22 211:12	272:10,16
161:19 177:11	o'leary 2:21	213:2 214:24	281:24
185:21 186:17	oath 9:24 10:3	215:7 217:1,9	objective 20:17
190:19 196:20	10:5 43:10	217:18 218:5	25:19 113:10
211:9 212:21	149:21	221:7 222:12	114:4 192:2
218:22,23	object 54:1	230:15 231:1	209:4 223:23
219:1 223:3	74:7,15 78:8	231:14 251:4	objectives
224:15 225:22	78:23 81:13	269:7	23:16,19 29:20
228:16,25	82:14 100:9	objection 12:4	29:23 177:25
238:20 239:7	101:1 102:5	12:5,7 15:2	195:10
239:17 240:5	103:7 106:7	29:25 31:20	observation
245:22,23,25	107:2,10 110:7	32:23 33:7,25	51:22 114:13
255:15 257:2,3		34:13,22 42:6	116:24 141:14

141:22 142:2	263:23 264:2	226:11 229:3	99:11,25
196:20 197:9	264:11 273:8	237:8 270:13	100:13 101:5
220:14 240:7	273:16 274:7	ohio 190:18	102:16 103:1
243:2 276:14	276:8,17 277:2	192:16 194:15	103:13,20
277:25 278:19	277:7 280:3	195:11	109:14 110:22
279:15 280:4,9	285:14	okay 9:19	111:16 118:16
283:7,7,8	obviously	13:22 15:14,20	119:23 120:1
observations	39:18	16:5,9,14 18:7	120:17 121:17
5:11 20:7	occasions 43:9	18:19 19:4	122:2,6,15,20
22:10 58:19	280:17	20:10 22:20	123:2,11,19
207:20 209:21	occurred	23:18 29:22	124:12,19,24
220:18 268:18	162:12	30:13,18,23	125:4,10,21,25
283:2	occurrence	31:2 33:12,17	127:11,17
observed 38:1	86:16	33:22 35:4	128:25 129:11
38:3,4 114:12	occurring	39:13 41:23	130:14 131:11
114:14,16	225:7	45:8,15 47:18	132:1,7,10,13
115:14,19	occurs 214:4,13	52:10 53:10,20	133:14,21
116:5,9 130:3	october 4:9	53:20 54:11,15	134:5,24
142:11,13,16	64:21 81:11	55:11,14,17	135:16 136:23
143:10 159:11	82:11 188:12	56:12 57:6	136:25 138:7
171:14,22,24	233:23	59:3 60:14	138:17 140:20
203:21 204:3	offer 69:10,12	63:16,19,23	143:12 145:6
212:25 214:6	69:21 171:5	64:9,23 65:7,8	146:17,21
216:3 233:2,13	offered 71:21	65:19 67:16,25	149:8 150:5,13
234:20 237:17	offering 230:10	70:17 72:21,22	150:24 151:9
237:22 238:10	230:22 231:13	74:3,10,21,25	151:17,20
240:6,13	231:19 232:15	75:10 77:18	153:14 154:11
242:17,23	232:19	78:2,20 80:1	154:16,23
243:5,8 244:6	office 1:14 7:13	83:21 84:1,22	155:2,6 156:2
244:9,14	115:6	85:2,21 86:11	156:12 157:15
245:13 246:14	oh 31:16 56:22	92:14 94:4	158:3,19 159:8
246:18,24	79:18 124:9	95:17,25 96:13	159:9 161:2
247:4,10	181:14 199:3	97:3 98:5,11	165:8,12 166:6
249:13,18	204:25 208:1	98:15 99:3,7	167:24 168:6

169:3,8,23	237:11 238:2,5	oklahoma 80:9	155:18 170:2
170:13 172:1	238:18 239:17	omitting	171:6 173:7
173:16 174:12	240:18,23,24	248:24	182:6,18,21
175:22 177:7	241:18,23	once 9:8 11:9	216:16,23
180:19 183:2,6	242:2 243:1,14	20:2 139:8	220:14 230:11
183:14,22	244:19 245:18	195:15 199:17	230:19,22
184:2,9,24	246:11 247:13	199:19 203:3	231:13,19
187:18,21,24	247:17,21	274:24	232:15,19
188:2,25	248:4,20	ones 80:10	264:24 282:14
189:20 190:9	249:10,21	173:8	282:16
191:12 192:18	250:6,9 252:21	ongoing 45:11	opinions 38:18
196:14 199:22	253:2,7,9	ooo 2:23 3:10	42:11 63:24
200:11,25	254:4,6,14,20	6:4 286:11	66:15 68:2,11
203:15,18	255:24 256:9	opened 131:1	68:18 69:5,10
204:10,13,16	256:14 257:19	188:13	69:13,22 70:3
204:19 205:1,2	258:10,10,14	opening 177:24	70:6,14 71:2,9
206:4 207:1	258:19 259:2,2	operated	71:12,15 72:7
208:1,22 210:2	259:22 260:2	123:20 124:10	72:13 73:22,25
210:16,20	260:15,21	124:21	74:2 75:3,16
211:19 213:14	261:10 262:11	operating	75:19,22 76:3
213:20,25	263:3,8,14	130:23	76:9 77:21,25
214:9 216:15	264:6,22 265:3	operations	78:3,22 79:17
219:21 221:4	265:13 266:12	120:6	81:12,20 82:12
221:14,19,19	269:14 270:3,6	opine 230:2	82:23 83:11
221:20 222:13	270:8,13,14	opinion 48:17	84:17 91:4,22
222:18 223:15	271:6,11,15,24	66:17,19,21,23	94:19 101:25
224:4,16	272:4,21 274:5	68:22 70:24	102:3,10,14
225:23 226:20	274:10 275:19	71:10 72:16	111:23 177:4
226:21,23	276:2 277:15	82:1,19 83:3	232:2 267:3
227:18,22	278:8,10 279:4	83:17 84:24	opportunity
228:14,17	280:1,16	91:9,18 92:21	11:10
229:3,21 230:2	282:20 283:20	94:2 101:14	opposed 127:5
230:21 234:25	284:8,16 285:1	113:5,9 138:19	281:20
235:9 237:2,5	285:5,24 286:5	143:8 149:7	

opposing 186:9 optimization 121:3 168:14 option 198:11 optional 95:22 96:2,3,15 options 30:19 order 162:24 163:3 229:15 281:9 orders 159:1 organically 262:2 organization 43:25 orig 153:25 original 112:9 112:20 113:11 114:5 115:21 117:13 118:8 118:12 141:18 143:7 151:4 194:6 196:10 230:8 241:2,8 241:24,25 245:2 251:19 251:22 252:10 252:12 265:5 273:5 275:15 283:5 originally 250:21 outcome 36:7,9 216:8 269:12	outcomes 36:10 outlined 240:12 output 63:7 107:15 233:2 outputs 151:16 192:24 218:21 233:13 240:11 280:8 outreach 24:3 outside 19:23 133:7,23 149:4 173:13 214:21 215:4,14 216:11 230:16 232:12 overall 26:12 87:23 90:6 144:18 155:17 241:9,16 242:16 244:13 252:5 277:9 overcoming 206:1 overestimate 174:20 overestimates 243:9 overly 212:10 217:13 overstate 174:20 overview 5:22 30:5 88:11 96:24 99:16	269:19 own 66:19,22 135:22 <p style="text-align: center;">p</p> p 7:2 24:21 p.m. 1:13 149:14,14 286:10 pace 10:20 pad 105:7 page 3:4,13 38:1,18,20 55:17 57:16 60:6,7 65:21 72:24 73:2,6 75:11,14,19 98:16 104:14 119:24,25 120:2 121:18 145:8,11,12 146:17,18,22 152:1,7 153:15 157:16 159:5 161:18,19,23 168:4 172:4 173:17,18 175:23 187:12 187:16,22,23 187:25 203:17 203:19 204:21 205:3 207:18 207:25 221:15 221:21 224:6	224:13,14 225:21,22,22 225:25 226:18 228:15,19,24 228:24 229:5 237:4,7 240:19 240:21,25 241:24 247:14 247:19 248:15 250:12,16 251:11,13 252:15 263:11 263:12,12,13 263:18 264:7 264:21 270:7 270:10,12 275:17 284:14 288:10 pages 39:8 172:25 263:10 287:16 pane 262:12 panel 18:13,15 18:16,25 19:16 19:24 24:18 25:13,19 128:14 165:20 165:21 papadopoulos 47:4,6,9 48:4 48:18 paper 37:5 165:24 178:3
--	---	---	---

papers 27:2 177:11,15	part 9:15 20:23 23:13 24:1	party 46:10,12	161:24 162:9
paragraph 161:23 169:22	25:19 30:25	pass 275:8	162:11,16,20
171:5 173:9	43:8 50:18	283:20 285:6	172:7,13,23
221:21 225:25	52:6,22,22	286:1	185:11 222:1
226:12,17,24	63:14 74:3	past 95:21	223:25 226:5
228:19 229:2,3	76:22,25 77:3	181:8 184:8	227:7 229:17
229:4,22	79:6 117:21	187:19 227:6	237:15 241:3
237:12 240:25	128:24 132:3	path 179:9	242:14 245:13
241:19 242:7	142:4,22	pathway 162:8	246:5,17,18,24
251:12,18	160:14 167:7	pathways 240:2 279:14	246:24 247:3,4
264:25 265:4	175:19 176:11	patience 275:6	249:12,13
paragraphs 146:22 177:24	187:8 190:7	pattern 177:22	262:21,24
parameter 31:12,15,18	192:2 203:11	payment 269:12	264:2,11,16
32:3 35:15,23	234:6 265:22	pce 3:24 5:4	265:10 276:6
35:25 87:9	pertain 17:12	38:2 86:22	276:15 285:14
158:24 159:14	partially 21:25 90:25	87:3 113:17,23	peer 18:12 34:7
parameters 21:2 35:8,13	participate 20:5 61:10	114:12,12,12	57:15 78:21
35:14,22 123:3	66:3	120:8,22	165:21
164:11,19,25	particular 89:13 177:20	121:24 122:11	penalties 288:21
165:6 174:1,2	185:5 186:20	122:17 123:8	pending 9:1 13:1,8
201:22 202:24	243:2	123:16,25	people 24:14 159:21 177:18
203:13 211:10	particularly 79:25 239:24	124:14 125:1	185:22 186:16
212:21,24	279:12	125:11,15,19	perc 188:9
214:5 216:2	parties 44:21	125:22,25	percent 56:17 69:7 123:21
220:25 233:9	partly 155:5 198:16	126:2,6,7,11,13	percentages 158:10
265:15,19,21	parts 69:2 193:15 275:21	126:19,21	perception 173:4
266:1,7		127:12,14,24	percolates 21:6
parsimony 210:21,25		130:15,17,22	
		133:24 141:20	
		147:2,6 148:17	
		157:23 159:11	
		159:18 161:10	

perfect 105:16 106:14 257:10	permeability 134:17 238:25 277:19	phrased 214:13	142:17 143:11
perfectly 103:5 103:11 176:3	permeable 134:11	physics 180:17	143:25 144:9
perform 27:10 34:16 35:18 88:21 89:20 107:13 109:15 150:25 151:17 163:23 164:3 165:4 202:13 233:20 242:13	person's 145:16,20 146:15	pick 25:11	144:12 145:2
performance 113:12 141:17	personal 101:19 181:15	pieces 187:10	145:16,18
performed 32:17 33:10 108:24 190:16 230:7 271:7	personally 45:17	pin 15:11 206:20 211:25	148:1 150:22 152:10 153:8
performing 34:3 272:22,24	pertain 21:2	pinder 185:21	157:2 179:2,15
perimeter 31:9	pertaining 17:5 17:25 18:1	pinning 212:6	180:4 220:12
period 53:8 58:4 138:21,24 139:13 142:20 153:1 198:18 199:16 208:17 209:15 225:8 239:14 268:19 272:9,15 273:4 278:17	perturb 35:22	pipe 44:8	224:1,2 232:5
periods 163:5 208:9	perturbations 180:9	place 287:8	272:1 280:25
perjury 288:21	perturbed 216:5	places 229:10 229:23	281:16 282:8 284:1
	pest 32:3,10 100:19 218:20 218:21 219:18	plaintiff 1:5 2:2 47:17	plants 87:4
	phase 52:7	plaintiff's 13:6 47:19	play 219:6
	phd 55:19 57:8 57:12 194:17 281:18	plaintiffs 8:2,4 46:15 188:7 194:9	please 7:18 8:6 8:15,17 10:20 11:3,23 12:6 12:24 15:19 23:18 36:24 55:7 70:18 72:23 75:11 103:14 111:3 115:9 129:22 141:4 146:17 150:2 157:15 160:24 161:17 203:16 204:20 207:14,18 214:1 225:21 237:3 250:6 252:13 259:22 260:5,13 262:8 262:12 263:9 270:6
	phenomenon 157:13 171:15	plant 38:6 50:13,15 114:3 114:7 115:2,14 115:16 116:1 117:7 120:5 122:12 123:16 124:15 126:1,7 126:16 127:4 127:14,18,25 128:7 130:3,16 131:10,25 138:5 141:25	
	photographs 16:24		
	phrase 102:8 143:14 155:22 210:17 242:8		

plg 154:12 259:8	173:17 175:21 178:21 179:5	possession 16:25	244:22 245:3,6 246:8 250:22
plj 153:17 154:12	179:22 180:21 191:8 197:22	possible 14:25 36:14,18	250:25 251:1,7 251:8,19,22
plot 37:25 155:16,23,24 156:16 159:22 160:1,15 180:3 234:21,21 249:22 250:14 262:17	200:5 220:17 220:17 238:1,1 258:10 271:8 272:23	173:24 237:1 271:6,10	252:1,9 259:20 264:16,24 265:14,22 268:14 271:7 272:22,24 275:16 282:21 284:18,22 285:12
plots 154:10	pointed 179:12 236:13	possibly 193:19	poster 207:11 208:15
plotting 63:9	points 51:7 113:25 120:10 154:25 189:23 204:11 234:21 250:2	post 4:3,9,14 27:10 60:8 62:2,21 65:13 67:8 71:18,21 79:3 88:2,6,21 89:19 90:23 92:3,7,11 102:9,11 106:20 107:9 107:25 112:8 112:19 113:7 113:11 115:17 116:3,8 117:4 117:9,22 121:14 122:4 123:4 130:11 164:25 167:21 171:17 214:22 215:6,16 216:16,19 232:21,22 233:17,20,21 234:6,11 236:2 236:4,7,16,20 236:23 240:15 241:2,4,15 243:22 244:1	posting 172:22 potential 189:24 225:2 potentially 45:1 53:4 129:21 potentiometric 162:5 pour 133:22 powerpoint 4:19 98:6 99:13 103:15 prabhaker 25:17 101:7 165:24 practice 31:23 234:17 practices 91:13 91:13,25 112:1
plug 212:13	pond 46:19,19 49:4,9 52:24		
plume 47:1 114:8,20 116:17 237:15 239:4,24 261:22 262:6 262:21,24 263:4 276:6,15 277:3,12,23 279:11	poorly 46:19 49:3 porosity 201:21 238:25 277:19		
plumes 38:25	portion 21:6 67:19 163:24 262:23		
plus 65:3 220:9 220:13	portions 90:17 167:12,12		
point 89:9,21 90:2,13,22 91:5,23 92:7 92:11 94:25 128:2 142:5 157:5,23 168:8 169:7,8 170:5 172:4,23	posed 188:25 189:11 212:11 positive 85:25 196:13 243:10 244:8 257:2,8 257:8 258:6		

pre 62:21 precipitation 135:6,7 200:22 precise 172:23 179:10 267:10 precisely 99:2 118:7 277:7 precision 172:10 241:6 predict 23:7 130:1 271:17 predicted 172:7 273:7 predicting 114:22 prediction 246:20 247:6 249:3 predictions 170:18 173:6 predictive 218:3 predicts 244:5 244:9 predominantly 109:12 preferential 240:1 279:14 pregnancy 227:15 pregnant 225:9 prelim 42:19 premise 168:13	preparation 61:14 62:8 prepare 36:25 40:13 41:13 43:12 prepared 60:8 60:10 65:20 267:18 preparing 27:4 78:3 preponderance 188:7 present 2:14,16 41:3,6,10 97:2 119:9 161:8 228:7 266:14 266:19 presentation 28:8 98:6 presentations 20:6 26:4 27:5 presented 31:1 194:6 207:11 241:6 250:22 274:3 presenting 175:5 237:13 276:4 press 145:22 presumably 143:22,23 presuming 52:23	pretty 158:10 220:2 previous 118:18 previously 25:18 206:16 primarily 37:2 37:18 44:2 184:12 primary 20:17 21:7 29:4 46:5 89:16 115:1 116:16 209:3 223:23 princ 24:19 principal 19:9 24:25 25:5,16 101:11 principles 95:16 147:7 232:8 prior 14:17,22 17:6,18,25 18:2,9,21 19:1 46:1,2 53:20 54:6 62:4 136:4 232:21 284:14 privileged 16:21 probabilistic 157:11 164:12 164:14,20	probability 35:16 36:9,14 probable 36:4 36:17 53:1 probably 48:15 56:14 79:10 162:19 178:20 205:16 problem 211:20 problematic 212:6 procedural 42:7 procedure 16:18 40:16 72:6 procedures 206:14 proceed 59:17 149:18 223:4 proceedings 287:7,12 process 6:1 20:8 24:17 26:7 27:14 30:24 31:6 35:2,5 36:12 61:11 63:1 66:11 79:3,7 96:20,24 99:20 107:25 110:12 110:16 112:4 118:10 128:13
---	--	--	--

128:24 129:6 144:14,23 205:24 206:21 269:21 270:15 272:22 273:1,9 281:13 processed 241:5 processes 87:23 91:20 147:18 174:5 239:13 270:16,18 278:16 processing 62:2 62:21 produce 172:21 produced 39:22 40:1 146:4 259:7 260:17 product 144:19 production 3:16 16:20 44:6 products 174:9 profession 206:8 professional 15:8 56:18 62:13 281:7 professionally 101:17 professor 55:19 60:17 61:19	80:8 95:18 96:16 177:8 190:18 proffer 70:13 program 24:22 programs 57:10 progress 20:1 20:12 25:21 project 18:13 18:18 19:8 20:14,16,24 23:12 24:2,9 24:14,21 25:6 25:16 26:2,13 26:19,25 27:16 28:2 29:6 44:5 44:11,14,22,25 45:6 52:8 83:8 88:10 90:6 96:22 101:8,12 191:15 205:18 206:11 projects 24:15 29:4 56:23 60:25 183:15 272:20 proper 160:11 properties 103:24 201:21 202:5,9 239:1 277:20 property 47:1	proportions 193:22 proposed 131:17,21 132:11 protesting 44:22 protocol 98:20 99:5,17 protocols 19:21 provide 24:5 25:20 30:4 70:3 72:13 92:6,10 99:16 101:25 102:3 106:20 173:10 173:20 174:7 175:10 187:11 provided 27:2 27:7 28:6 42:13 62:10 74:12 77:6,11 88:13 89:2,7 92:3 242:23 265:15 266:7 269:1 274:25 provides 172:17 245:9 providing 20:11 36:22 173:8 175:25 220:21 provo 8:19	provoking 177:10 psops 168:10 168:12 public 1:18 24:2 172:19,25 175:6 publications 57:15,18 58:15 62:4 publicly 258:16 258:19 published 26:6 91:6 146:3 165:24 177:20 183:22 188:23 191:6 233:16 publishing 27:4 pulled 213:15 pump 23:1 44:8 202:13,14 pumped 21:13 49:8 50:7,11 53:4 128:20,21 142:21 197:21 pumping 87:1 116:2 120:23 121:2,4 122:12 143:22,23 144:10,21 147:22 168:15 168:16 189:3 189:13 198:15 199:1,4,6,21
--	--	---	---

201:9,10 235:23 272:6,8 272:14 purely 191:21 194:16 purpose 21:22 22:14 23:12 28:13,15 52:15 52:23 53:11,14 71:18,23 88:1 99:15 183:7 211:3 280:18 purposes 22:18 22:21 23:15 28:20 29:3 53:17,19 242:22 pursuant 16:18 pursue 44:4 push 177:12 put 36:23 37:17 39:11 43:9 64:10 87:21 106:17 164:8 185:25 210:7 223:14 285:3 putting 190:21	qualitatively 140:15 quality 168:16 170:8 quantify 203:3 quantitative 230:13,24 231:21 234:5,9 235:1 quantitatively 250:24 quantity 162:16 270:17 question 10:6,8 11:4 12:1,6,7 13:1 33:3 34:5 42:3 53:6 54:5 56:13 93:14 117:16 118:18 127:2,10 133:4 136:10 137:7 137:10 141:8 141:10 188:25 189:10 191:13 195:15 214:1 216:22 217:14 217:17 218:12 219:8 226:1,2 230:20 231:17 238:3 253:18 265:23 questioned 43:10	questions 10:15 11:23 42:2 69:1 186:13 194:21 195:7 238:5 274:11 274:13,20 275:7,11,21 282:2 286:4 quickly 89:3 quite 28:22 114:17 143:11 171:15 174:21 208:9 271:22 quote 104:2,14 104:15,17 105:14 quoted 104:6 quotes 103:20 105:5,8	randall 94:8 range 35:23 36:10,16 114:15 119:12 140:12 158:25 161:14 162:21 166:16 170:19 173:23 203:13 214:21 215:4 215:14 216:6,9 216:12 219:2,5 227:23 283:4 ranging 162:24 rank 229:15 ranked 229:14 rapidly 134:10 134:13 rate 108:5,7,9,9 108:11,13,14 108:16 109:2,6 109:7,8 121:9 121:11,13 135:13 140:13 144:10 151:14 154:2,5,8 155:21 157:23 162:4,13,15,18 162:19 163:1,3 163:6,12,19 197:13 201:1,3 203:5,7 235:23 259:20 263:24 263:25
q		r	
qualified 230:19 qualitative 234:5,10,23 249:23		r 7:2 24:21 60:10 104:22 r00004 153:25 radioactive 108:21 railroad 46:7 46:16,20 47:3 49:7 rainfall 21:5 258:16,20 259:18,19 ran 117:23 159:12	

rates 22:2,7 121:4 144:21 147:22 151:11 152:15 162:12 162:24 201:10 272:6,8,14 rather 10:17 229:12 277:8 ratio 219:13 246:17,23 247:3 reach 157:6 reached 186:12 189:3,13 191:24 193:20 193:21 226:7 reaching 195:14 reaction 108:5 108:7,8,13,15 109:1,2,7 150:20 151:11 151:13 152:15 154:2,5,8 155:21 157:23 reactions 177:17 239:12 278:15 reactive 173:5 174:4,6 read 11:11 17:14 20:3 58:5 79:10,15 79:20 85:10	87:14 90:1,7,9 90:10,16,25 93:24 104:4,19 105:8 130:10 145:25 147:10 163:8 164:13 166:23 167:5,7 167:12,17 168:18 169:21 170:21 171:2 174:10 175:19 177:23 178:2 185:18 187:21 188:17 205:11 208:13 214:7 222:6 225:19 226:10,22,25 227:9,16 229:19,22 237:19 238:3 239:5 240:3,16 241:11 242:19 249:4 265:11 270:21 275:1 275:21,23 284:12 288:7 reading 86:9 89:21 91:19 110:9 121:21 161:22 164:17 164:18 167:15 169:7 172:3 181:21 185:9 205:2 224:18	226:14 248:16 reads 214:3 226:2 227:3 237:12 240:25 242:12 265:4 ready 55:10 274:24 real 103:11 169:10 170:24 221:1 271:3 realistic 203:7 reality 103:2 104:1 105:16 106:11,15 271:5 really 26:18,19 134:8 139:7 155:18 156:23 191:5 197:15 233:14 reason 12:11 12:15 89:13 90:11 117:3 156:11,13 163:22 180:2 236:6 255:19 273:19 279:4 288:10 reasonable 35:24 174:24 175:2 203:13 206:2 reasonably 87:22 192:5	212:22 217:4,7 232:6 reasons 159:21 171:20 172:2 237:18 238:8 238:13 274:2 276:9,10 rebut 42:11 rebuttal 3:25 4:11 37:10 38:16,17 39:3 54:18 64:19 65:11,16 66:22 67:11 68:1 71:21 74:7,12 75:12,15,22 76:12,16 77:15 81:18 84:9,12 107:23 109:20 109:23 132:4 138:15 159:3 159:10 167:9 167:16,19 171:18 235:14 235:16 240:19 245:15,20,23 246:8 249:7 250:7,18 251:11 252:14 262:9 263:7 264:20 285:23 rebuttals 128:11
--	---	---	---

recalibrate 118:3,6	recently 42:21 108:4	166:16 208:9 208:17 209:14	119:16,18 124:6 153:10
recalibrated 117:25	recharge 20:19 20:25 21:4	222:24 223:2 227:23 259:5	reflect 271:3 reflects 288:9
recalibration 112:7,18	22:2,7,15 197:13,19	261:15,18 286:9	refocus 101:24 regard 30:12
recall 14:15,18 15:9 26:17 29:8 31:7 32:11,15,19 41:2 42:15 46:10 48:2,7 49:16,20,24 50:16 51:1,3,5 51:8,14 52:21 53:11,15,17,18 54:10 78:1,9 78:17 80:10 81:16 85:13 90:1 95:1 96:1 110:9,13 111:13 139:17 169:6 178:7 183:17 184:1 190:3 193:13 198:6 199:17 245:7,24 268:21 274:1 274:17,23 275:25 282:4 284:15	198:2 201:1,2 203:2,4,7 206:17,21 212:1,7 259:20 recite 268:9 recognition 191:7 recognize 55:11 97:24 187:5,7 recommenda... 20:7 reconstruct 225:14 reconstruction 105:19 114:6 119:9 161:8 173:19 175:9 176:3 184:14 184:17,21 200:19 223:24 226:3 228:7 record 7:4,19 10:14,21 11:1 54:22 59:12,15 64:15 118:17 119:11 149:12 149:16 161:13	recording 7:6 recreate 191:16 193:3 195:12 red 122:20 123:6 125:14 151:3 reevaluation 118:14 refer 38:21 39:19,23 63:18 65:15 96:22 154:20 159:2 211:24 reference 96:23 101:4 166:4 referenced 78:12 79:1,6 references 78:18 referencing 98:19 referred 110:10 110:11 288:7 referring 40:18 40:20 50:12 65:17 67:6 69:20 77:9 80:14 118:19	regard 30:12 51:10 81:18 98:19 214:19 regarding 4:1 4:12 65:11 68:3 76:3 237:23 278:3 282:3 regardless 196:14 229:16 region 202:18 230:5 registered 287:5 registry 224:24 reich 2:18 reilly 100:2 related 17:20 24:11 44:25 57:22 69:2 80:4 224:22 282:21 relates 99:20 relationship 181:16 relative 73:25 102:10 141:12 229:12 241:8 268:15

relatively 140:17 155:15 158:17 179:10 209:14 219:3 234:17 241:9 241:15 246:3 252:4	85:21,23 164:15 167:15 187:25 221:12 222:8 237:14 238:9 271:19 271:23 274:18 275:20 276:5 284:24	report 3:25 4:11 20:3,7 37:10 38:16,17 39:3 43:12 47:10 53:11 54:18 60:3 61:8,15 62:6,7 62:8 63:17,20 64:6,19,21,22 65:11,11,16 66:1,4,5,18,22 67:1,11,14,17 67:19 70:12,16 71:16,19 72:25 73:10,14,16 74:12,19 75:3 75:7,12,15,22 76:12,14,17,19 76:20,22,25 77:4,12,14,15 78:16,19 80:15 80:17,20 81:2 81:10,10,12,18 81:19,21 82:10 82:13,23 83:11 84:8,9,12,14 90:2,3 107:23 108:3 109:20 109:23 111:18 111:22,24 120:15 128:11 132:4 138:10 145:22 159:3 159:10 161:18	163:11 167:9 171:17 172:12 176:22 204:18 230:2 235:13 235:16,18 237:3 240:19 241:3,8,20,24 241:25 245:15 245:19,20,24 246:2 247:16 249:8 250:7,15 250:18,22 251:11 252:10 252:14 257:19 257:21 258:12 260:3,22 261:20 264:20 285:2,4,10,18 285:23
released 107:20 133:9	remind 149:20 283:11		
relevant 79:13 88:24 89:5,25 167:22	remy 80:18		
reliable 93:4,20 95:4 100:6,24 230:3,12 231:20 265:9 280:23	renaissance 104:7		
relied 108:2	renamed 44:1		
reluctant 181:25	render 71:10 73:22 102:10 102:14 230:19		
rely 239:19 279:6	rendered 75:3 232:2		
remainder 267:1	rendering 77:21,25 78:22 84:17,24 94:2 94:19		
remains 230:3 265:8	rene 17:10		
remarkably 242:15	repeat 141:4		
remember 9:13 13:15,17 14:15 15:5 29:22 30:6,9 31:4,5 31:10 48:9,15 49:12 85:11,14	rephrase 127:10		
	replaced 162:17		
	replicate 103:11		
	replication 105:16		
			reported 162:20 195:9 245:23 246:2 257:20
			reporter 1:16 7:17 8:6 10:13 10:21 11:1 104:10 186:25 206:25 287:5,5 288:2
			reporter's 287:1
			reporting 172:6,18 241:3

reports 23:24 27:1 37:3,3 44:25 47:20 66:12 68:2 69:8 71:3,17 72:14,18 80:2 80:6,12,13 81:6 84:21,23 85:7,15,23 89:8 90:12,13 90:18,22 94:19 101:24 102:4 102:15,17,22 111:9 118:21 130:21 175:6 235:11 284:6,7 284:9 represent 7:19 8:24 16:5 47:4 109:12 146:2 213:14 239:21 243:12 279:8 representation 106:14 178:23 representative 9:11 45:11 represented 44:18 46:11 125:5 144:15 270:18 representing 180:14 277:3 represents 44:2 153:7 220:6	reproduce 35:9 103:5 237:24 reputation 82:5 83:5,22,25 92:22 request 3:15 requested 56:11 70:1 requests 16:20 require 72:6 required 19:23 95:24 200:18 219:17 requires 10:5 reran 113:6 117:16 rerun 117:20 118:1 research 18:13 18:18 19:25 20:11,17 23:10 24:15 25:20,25 58:16,18 60:20 101:21 172:20 176:10 181:24 182:1 209:4 researcher 101:19 researchers 21:20 researching 208:23 reservation 50:18	reservoir 23:3 resided 225:9 residual 243:1 243:11,13,15 257:2,3 residuals 243:19 255:17 257:25 resolution 238:15 239:18 239:22 279:5,9 279:21 resolved 236:19 resource 22:22 resources 209:9 respect 107:15 238:2 respected 48:9 82:9,21 83:19 92:24 176:14 respectively 162:2 respond 23:8 71:20 response 5:15 104:23 177:23 177:23 202:15 228:8 rest 236:3 restarts 125:6 restate 33:3 137:10 141:12	231:16 265:23 restrictive 217:14 result 108:17 155:19 227:6 resulting 147:24 150:21 153:4,23 154:1 185:13 190:24 232:10 247:23 results 62:11 71:19 107:21 108:1 112:10 112:21 117:4 133:13 143:9 150:19 152:19 154:5,7 156:21 157:12,13 168:17 179:17 182:19,23 203:1 228:21 229:7 233:8 234:19 237:7 237:13 241:5,6 244:18 245:3 249:2 250:21 251:23 252:2 262:2 273:7 275:22 276:3,4 resum 55:25 56:4,8,9,9,10 56:14,20 57:7 57:16 83:8
--	--	--	--

resume 4:5	94:15 110:19	73:3,7 74:14	156:4 158:1,4
retained 13:6	111:6 128:14	75:10,14,16,19	158:7 159:9
13:25 44:19	146:8 165:16	76:11,14,17,20	160:23 161:22
46:3 72:2	169:5 180:24	77:8 84:9	163:13 164:8
retardation	183:23 222:18	86:17,23 87:13	164:10 165:2
107:16 221:25	reviewer 34:7	92:4,8 94:11	166:11 167:3
retention 17:6	176:21	97:5,19,23	177:2 180:23
17:18 18:1,2,9	reviewing	98:7 99:5,14	181:3 183:7
18:22 19:2	15:21 18:17	100:20 101:9	184:2,11 185:1
review 18:12	23:24 32:22	101:23 102:4	188:21 189:5
19:24 20:8	40:11 81:1	102:18 103:2	189:15 192:14
23:21 26:5	221:12	103:21 104:24	193:12,15
27:1 33:11	reviews 165:23	106:15 109:3	195:17 196:7
37:21 42:10	174:19	118:22 119:2	203:19,24
46:3 47:6,8,21	revised 64:16	119:20,21,22	204:11 206:11
55:8 77:23	rich 220:2	120:12,15,19	208:17 210:5
78:2,20 79:4	richer 115:20	120:24 121:5,9	210:21 211:1
81:6 84:16	right 8:13 9:19	121:14,25	211:11 213:1
85:6 86:4,12	9:22,25 10:1	122:13,18,25	213:23 214:11
86:15,19,25	11:14 19:6,17	123:4,9,17,21	214:23 215:6
87:8 88:25	21:3 23:15,17	124:1,3,16	215:16 218:11
89:11 110:4,23	25:24 27:18,24	125:2,8,12,16	221:2,6 222:19
111:2,8,9	27:25 28:20	125:23 126:3,9	222:21 223:15
130:20 164:11	29:6 30:2 32:4	126:14,22	224:17 225:24
164:15 165:19	33:15 36:2,15	127:15,20	226:25 228:18
165:20,21	36:20 37:5,13	128:3 130:18	229:25 230:8
167:1 170:7	38:16 40:6,10	132:2 135:1,4	230:14 231:23
177:14,19	42:16 47:20	136:21,22	234:7 235:2,6
reviewed 37:2	49:1 53:6,8	143:15,25	235:11,14,19
42:16,19,24	54:16 55:22	145:7 148:14	235:24 237:6
57:15 62:3,3	56:15 59:10,18	148:23 149:19	238:11,16
62:14 78:21	60:4 62:19	150:8,14	241:16,21
80:1,5,6,23	63:12 65:4,13	151:11,24	242:6,24
83:8 92:19	65:22 67:11	152:1 153:15	243:15 244:20

244:24 245:20 246:15 247:18 248:9,16 249:15,19,24 250:3,12,12,16 250:22 251:2 251:17 254:22 255:6,25 256:15,21 257:5 258:17 258:21,25 259:20 261:2 261:23 262:3,6 262:21 263:1,4 263:17,21 264:4,13,23 265:16 266:8 266:20,21 269:22 270:25 271:3,13 272:2 273:12 274:8 277:13 284:22 285:6 286:2 rights 43:8,18 45:1 rigorous 91:11 91:25 river 5:20 196:22 197:5 258:24 260:10 260:24 rmr 1:16 287:23 288:2	robert 17:9 154:18 163:10 robustness 264:24 role 25:11 61:14 roman 204:21 241:25 roughly 137:14 155:14 199:15 233:24 246:1 269:9 rounding 256:22 row 157:18 247:23 rows 263:20 264:9 rule 72:11 rules 9:21 16:18 19:20 72:6 run 26:19 36:5 63:5 107:25 131:19 158:23 273:6 running 61:25 203:4 219:18 233:1 rwc 254:21 rwc2 235:23 rws 255:2	s s 3:12 7:2 24:21 s.s. 48:4,18 s2 256:10,16 sabatini 80:8 83:3 128:17 sabatini's 82:23 safe 273:18 salt 1:15 7:14 287:2 288:5 sample 5:14 142:2,24 sampled 141:21 samples 50:21 50:25 130:8,9 130:11,13 208:6 sampling 142:7 143:3 200:6 santa 46:17 satellite 22:10 209:21 sautner 17:10 145:22 save 63:5 181:9 savitz 17:10 saying 63:21 68:17 70:19,24 163:11 273:20 says 65:20 103:23 104:15	120:2 145:13 147:1 151:23 153:25 161:24 168:12 169:9 170:7 172:6 173:18 188:6 205:6 208:5 221:24 228:19 239:17 240:5 241:13 248:12 248:17 270:14 scale 142:8 156:3 159:23 160:1,5,18,21 239:23 240:1 246:3 279:11 279:13 scatter 37:25 249:22 schedule 87:2 121:2 122:13 123:17,20 124:15,20 schedules 120:23 201:9 school 24:5 186:15 science 19:8,22 24:5,22 sciences 176:12 scientific 103:25 112:1 202:22 224:21 232:7 265:8
---	--	--	---

scientifically 265:7	221:16 227:1 234:21 242:10	sensitivity 32:17,21 33:6 33:10,14 34:3 87:9 108:24 109:15,24 120:3,18 163:23	set 35:14 63:7 113:18,23 115:20 186:19 198:20 200:8 212:25 214:6 214:11 215:6 215:16 216:2 218:22 220:2 283:18 287:8
scientists 209:5	247:18 248:2		
scope 108:20 133:7 149:4 173:13 219:19 230:16 232:12	248:21 251:15 251:20 253:14 262:16,17 265:1	sent 16:3 17:5 sentence 168:9 169:9,21 171:7 175:20 205:3 205:17 224:19 237:12 242:8 248:17 251:18 270:10	sets 113:17 212:24 214:5 setting 167:25 settlement 45:13 seven 9:15 41:21 170:13 264:8
scott 17:11	seeing 183:17		
screened 252:23	seemed 31:6 91:11 116:14 140:16 167:22 178:3	sentences 265:3 september 13:14 161:25 170:15 233:22	several 18:11 44:21 46:2 60:23 80:5 159:1 237:18 269:24 276:9
seasonal 239:10 278:13	seems 33:13 83:9 156:8 163:10	series 38:2 44:6 44:24 141:23 152:21 186:6	shaking 10:17 shaped 159:15 share 61:21 69:6 185:23 sharp 239:25 279:12 shifted 58:18 short 61:2 209:18 shorthand 287:13,18
second 153:2 159:4 172:4 207:24 240:24 264:25 278:10	seen 15:24 16:2 24:16 120:13 161:11 166:4 171:4 183:24 207:5,8 213:11 213:20 228:11	served 18:12 19:17 45:10 46:12 47:25 53:21 54:7,12 56:25 64:17 176:21 services 225:1 serving 19:14 19:15 45:22 181:7	
section 38:21 218:19 226:1 240:12 241:13 251:14 264:23 276:3	select 49:19 selected 24:18 25:13,14 35:13 35:22 248:23 selection 30:15 semester 192:6 193:4 198:22 send 64:25 65:5 sense 106:10 172:17 173:10 181:22 232:25 sensitive 108:6		
sections 37:15 99:12 167:22 169:4,5			
see 10:12 37:4 37:12 38:15 58:5 86:7 91:1 120:9 121:18 122:8,22 124:6 124:8 146:24 152:22 157:9 157:20 159:4 159:15 168:9 170:17 198:7			

show 152:24 159:22 160:11 269:15 showed 65:9 114:25 showing 186:22 shown 162:6 245:14 269:3 shows 38:2 120:21 122:10 122:16 123:7 123:15,24 124:13,13,24 125:11,15,18 125:22 150:21 180:3 204:2 250:10,14 252:21 258:15 258:19 263:23 shut 199:20 224:3 side 36:24 39:12 46:15 47:5 64:10 164:9 223:14 250:12,16 sides 186:9 sidetrack 36:21 sign 11:13 275:2 signature 60:12 65:21 287:22 significance 234:14	significant 22:24 30:10 44:16,18 75:2 114:19 116:8 133:12 139:3 139:25 162:16 172:11 180:6 201:15 230:6 254:3 283:12 significantly 118:13 139:12 171:15 silverstein 2:8 7:22,23 similar 97:2 195:21 199:18 201:22 246:1 250:14 similarly 163:7 simple 142:23 147:5,16 148:2 148:22 198:2 210:12,17 233:14 245:17 245:19 285:15 simplification 271:5 simplifications 106:10 simplified 103:2 simplify 62:25 simplifying 277:5	simplistic 212:10 simply 129:1 147:21 233:12 255:14,22 257:17 simulate 103:12 108:22 121:3 129:18 129:20 155:3 190:23 simulated 37:25 38:4 48:24 114:17 115:12 116:5 126:12,20 127:13 130:16 131:24 133:10 137:21 138:8 141:13 142:11 143:9 148:17 151:15 152:9 152:12 153:23 156:16 171:13 171:21,24 179:13 195:21 220:13 234:20 237:17 238:10 241:3 242:17 242:22 243:4,7 244:14 245:13 246:14,17,18 246:23 247:3 247:10 249:11	249:18 261:22 262:21,24 263:24 264:16 273:16 274:7 276:8,17 281:15 285:13 simulates 128:20 205:9 232:4 277:3 simulating 46:25 108:21 116:16 147:18 148:12 175:2 179:9 205:7,14 220:20 237:14 239:12 242:13 276:5,14 278:16 simulation 3:21 5:1 36:6 70:22 86:20 94:6 107:18 116:7 116:20 138:21 138:24 150:19 153:1 154:2,8 161:9 195:13 219:18 233:1 237:25 239:14 241:5 268:19 278:17 simulations 44:24 61:25 87:10 88:22 107:14 121:8
---	--	--	---

190:20 273:6 single 72:16 170:9 212:25 214:6 267:21 sinks 201:17 sir 229:1 sit 70:4 site 168:15 173:22 175:11 180:18 185:11 185:25 190:14 197:17 202:12 211:5 221:5 222:14 sites 172:25 sits 214:20 215:4,14 sitting 75:7 246:6 situ 22:9 situation 212:12 six 41:21 57:21 57:22 75:18 241:24 size 49:14 skim 90:8 167:13 skimmed 85:8 85:12,15 86:6 90:12 93:25 167:6 169:4 skinner 188:20	slide 98:16 103:18,21 105:1 slides 99:18 slight 282:19 slow 10:20 small 50:17,19 131:8 142:3,4 156:23 158:17 160:16 180:11 198:23 240:1 250:25 251:7 251:25 252:3 279:13 smaller 19:13 116:21 smallest 154:24 snow 135:6 software 31:25 32:2 60:21 61:24 192:12 245:9 soil 238:24 277:18 solely 283:6 solution 143:15 solutions 36:15 36:16 solvent 133:24 solvents 133:16 133:23 194:24 199:19 somewhat 262:1	soon 42:5 sophisticated 29:9 sorption 148:4 sorry 39:10 41:16 59:23 91:15 126:16 199:24 204:25 207:15 215:9 224:12 237:8 238:6 259:9 265:23 sort 9:21 18:7 22:11 27:13 34:19 68:21 84:7 99:11 101:23 125:4 146:21 151:25 157:17 210:20 274:6 soto 17:11 sound 11:7 13:3 91:13 111:25 112:25 136:21 193:23 232:7 265:7 sounds 11:8,15 13:4 50:21 77:17 136:22 source 21:8 156:17 157:7 180:7 197:18 sources 22:24 201:16 222:5	222:19 south 1:15 44:9 southeast 20:18 21:15 southern 1:2 29:10 44:1 span 50:25 209:19 spanned 199:16 sparse 5:9 207:19 208:24 spatial 169:12 171:1,11 spatially 239:2 277:21 speak 10:20 speaking 11:6 42:5 143:13 special 234:14 specialization 57:9 specialized 57:12 specific 13:15 69:1,5 70:21 71:17,25 82:16 84:20 91:17 110:13 142:5 168:15 169:7 172:21 191:19 193:10 195:22 197:22 221:5 222:14 225:6
--	---	--	--

267:19 270:20 277:25 278:19 279:15 specifically 14:4 38:22 48:3 71:20 78:18 79:11,12 84:14 85:19 86:2 94:24 114:11 191:12 279:19 284:9 specifics 49:24 specified 164:4 spectrum 219:11 spiliotopoulos 71:22 80:15 179:24 235:18 236:1,8,13 split 124:5 spoke 41:1 sporadic 208:7 spread 155:13 156:7 157:8 158:18 spreadsheet 5:21 153:7,10 153:16 154:14 155:8,9,10 157:16 198:2 245:22 259:6 260:17 285:16 spreadsheets 152:21	spring 44:20 45:21 springs 21:12 45:2 ss 288:5 stabilize 156:8 stack 221:17 stacks 37:4 staff 60:19 62:8 62:11 stages 180:10 stand 79:24 standard 31:7 52:6 143:6 206:13 234:17 272:19 standards 20:1 20:12 25:21 26:1 stands 29:5 start 11:4 27:20 31:17,23 42:5 121:19,24 122:3 131:18 131:20,21 132:11 136:5,6 136:13 140:18 140:18 170:4 202:21 203:3 210:17 started 45:5 130:22,23 132:20 136:15 136:16,19	137:2,13 178:21 200:6 233:22 starting 45:20 122:17 123:8 123:25 125:1,3 134:23 168:10 205:3 221:21 224:19 270:10 starts 146:23 188:4 251:18 state 1:18 7:18 8:15,17 12:5 19:11 21:19,21 25:3 32:25 43:8 74:19 126:17 127:21 178:20 179:7,7 179:8 189:8 190:18 192:16 194:15 195:11 198:8,10,12 250:19 287:2,6 288:4,22 stated 23:22 29:1 83:11 156:6 178:16 256:6 261:20 statement 106:12 168:20 169:2,13 170:3 170:10 174:12 211:18 213:6 217:24 267:22	268:20 278:3 278:23 279:17 statements 63:24 105:9 174:15 267:12 267:15 states 1:1,7,14 7:21,23,25 8:24 13:8 16:17,19 20:19 21:15 179:10 229:5,22 288:22 stating 22:17 25:23 stations 258:24 statistic 246:13 statistical 158:23 159:12 195:24 196:3 244:17 statistics 235:5 242:24 245:10 247:24 stays 155:15 steady 198:8,10 198:12 steps 96:21 99:19 stick 178:8 sticky 37:13 stimulate 105:22 177:13 177:25
--	--	--	--

stood 111:14	students 96:15	280:6	239:20 277:16
stopped 116:1	105:8 186:8	subjected	278:4 279:7
199:21	187:11 191:13	164:12,20	successful
storage 20:20	193:3 196:6	submit 27:4	229:9,23
21:1,9,25	197:7 198:1,20	74:2	suffered 227:5
22:15 23:6	199:8	submitted	sufficiently
29:12 147:19	studied 14:10	37:11 47:18	230:12 231:20
148:13 149:1	21:17 22:3	55:16 62:15	280:23
209:7,12,24	182:22 190:19	80:12,14 81:5	suggested
stored 16:23	191:11	119:19 233:23	151:6,8 178:7
straight 148:18	studies 23:5	269:4	suggestions
stream 22:25	30:8 183:23	subpoena 16:7	26:9
52:3 196:22	192:7	subscribed	suit 45:11 50:8
197:9,11,13,24	study 32:18	287:19	suitability
211:25	114:5 145:13	subset 233:11	265:19 270:19
streamline	168:13 178:6	239:21 279:9	suite 1:15
62:25	178:10 183:1,7	substance	summarized
streams 21:13	185:20 186:7	149:23	241:10
45:2 51:24,25	187:9 190:12	substances	summarizes
51:25 197:10	191:6 192:3,16	224:24	241:19
street 1:15 2:11	192:18,20	substantial	summary 3:18
strengthens	193:9,14,18,24	131:23 132:2	4:20 38:18
116:25	194:14,17	136:3 137:2,15	75:16 87:19
stress 163:5	195:11 198:19	138:1 170:8	88:9,9 119:10
stresses 168:15	225:2,7,13	substantially	164:13,17,18
201:16	227:11 228:22	66:11 188:14	203:20 204:22
strike 51:9	229:8,10,23	283:3	235:4 242:4,24
69:11 107:7	232:12 242:15	substantive	245:9 246:12
121:22 199:23	270:4 272:9,15	112:9,20 268:2	superficially
280:21	suarez 17:11	268:4,11	149:25
strong 117:11	subheading	subsurface	superfund
191:5 196:3	238:18	103:6 174:4	190:14
student 60:17	subject 85:14	205:7,15	supervision
194:17	85:23 240:9	238:14,19,22	287:15

supplant 104:1 supplies 5:6 supply 49:4,10 50:12,19,22 87:3 120:6 121:4 126:2,8 126:13,21 127:15 144:11 145:3 147:23 157:4 161:24 163:2 172:9 180:6 185:13 195:14,16 203:22 204:7 248:19,24 272:6 274:8 support 47:19 225:12 265:4 supporting 116:25 suppose 111:20 112:16 129:23 212:2 257:1 sure 9:23 10:6 14:14,24 15:6 19:25 22:13 23:21,25 27:17 28:22 30:7,11 31:10 33:2 56:7,19 58:4 59:2,10 63:22 68:17,20 73:1 75:13 78:11 84:5 95:2 96:8	102:7 103:16 110:12 112:15 127:9,22 128:4 129:23 133:21 134:15 136:11 137:11 141:5,9 141:14 151:21 155:10 158:22 161:20 164:14 165:22 166:21 170:4 171:10 181:14 183:10 190:8 192:7 193:13 198:25 200:13,16,21 207:23 210:9 215:10 219:12 245:21 248:22 253:6,19 254:13,19 255:1 261:8 270:13 275:18 surface 134:9 134:12,23,25 135:9,14 surfaces 104:23 surrounding 44:3 202:18 susan 17:11 susceptible 142:6 suspect 133:11 255:19	sustainability 22:1,16 23:14 28:18 29:2 58:1 210:1 sustainably 209:9 swear 8:6 sworn 8:9 287:9 syllabus 96:4 96:14 symposium 186:15 synonym 108:9 synonyms 184:18 synthesize 62:24 system 86:13 103:12 115:5 121:3 128:2 146:14 169:10 170:24 172:10 192:12,14 198:24 221:1 239:4 277:24 systematic 119:18	tabbed 37:12 39:24 40:12 120:15 table 134:8,16 135:10 162:3 170:17 203:20 241:18 245:14 247:18 248:13 252:13,17,18 252:21 258:12 258:15 260:3 260:22 263:7 263:10,18,21 264:7,9 284:12 284:13 285:10 285:23,23 table's 134:9 tables 241:1,7 241:20 tabs 37:17 tagged 37:24 38:18,19,24 take 12:19 15:19 58:25 59:9 102:12 103:25 113:11 129:12 134:21 142:23 148:4 154:11 186:9 195:12 198:9 222:22 233:8 233:19 253:7 255:14,16 256:9 257:24
		t	
		t 3:12 tab 37:15 38:13 39:8,25	

261:13 285:13	114:2,9 115:2	70:2 164:7	162:14 184:14
taken 9:4,7	119:6 120:7,19	265:16 266:8	205:9
12:18 42:17,21	136:4,14 137:4	271:13	terms 23:23
42:25 44:11	137:17 138:5	techflow 178:5	43:20 49:22
50:22 59:13	147:3 148:11	techflowmp	58:14 61:23
129:25 142:2	148:16 152:10	135:20 151:24	79:11 89:17
149:13 170:14	157:2 161:6	178:5 181:20	132:24 133:1
204:14 222:25	165:9,18 166:3	182:7,19,23	155:16,18
261:16 287:8	166:7 172:9	183:1,3,16,20	158:10,14
287:12,18	179:14 203:23	183:24	184:17 226:9
takes 135:3	204:3 210:4	technical 16:24	232:3 234:10
156:20 157:5	222:2 223:7,18	17:4,24	234:12,13
talk 42:3 58:23	224:1 226:3	techniques	282:14
105:22,23	228:4,10 230:5	110:5 225:13	terrace 4:1,7,12
177:18 237:21	230:11,23	technology	5:19 38:5 60:7
talked 137:9	231:19 232:21	183:4	65:12 85:3,7
268:14	233:20 247:15	tell 85:19	89:1,17,23
talking 143:18	248:5 265:10	226:14 246:10	90:12,18,23
144:5 194:15	272:24 280:25	284:8 287:10	91:3 92:4
200:14 202:9	282:9 283:25	temporal	102:4 106:21
217:23 237:21	target 268:15	169:12 170:9	106:25 110:1
252:9 268:13	targets 168:1	170:25 171:11	110:24 113:2
talks 96:20	taught 56:24	238:14 239:7	114:2,9 115:2
tap 50:13	tce 172:14,23	278:11	119:6 120:7,19
127:19 128:8	188:9	ten 45:6 57:15	136:4,14 137:4
tarawa 4:1,7,12	teach 95:19	58:17 257:7,8	137:17 138:5
5:19 38:5 60:7	97:1 186:6	257:13,14	147:3 148:11
65:12 85:3,7	193:4 212:18	tend 174:19	148:17 152:10
89:1,17,22	218:18	261:21	157:2 161:6
90:12,18,23	teachers 24:5	tendency	165:9,18 166:3
91:3 92:4	teaching 61:1	103:25	166:7 172:9
102:3 106:21	186:3	term 28:17	179:15 203:23
106:25 110:1	team 40:15,17	29:11 43:24	204:3 210:4
110:24 113:2	41:7,13 61:17	118:18 145:23	222:2 223:7,18

224:1 226:4 228:5,10 230:5 230:11,23 231:19 232:21 233:20 247:15 248:5 265:10 272:25 280:25 282:9 284:1 test 118:8 tested 145:21 testified 8:10 43:5,6 283:24 284:16 testify 12:20 testifying 11:17 43:3 testimony 11:11 12:13 16:7 149:23 268:5 288:7,9 testing 146:11 tests 202:13 tetrachloroet... 3:23 5:3 86:22 87:3 120:4,9 161:10 203:22 texas 57:12 text 17:2,17,22 78:11 92:15 94:5,11,16,18 95:3,18 96:3,3 96:15,23 99:4 99:9 100:1,5 100:14 120:9	188:3 207:21 207:21 226:24 textbook 95:23 95:24 97:9 texts 78:3 94:21 thank 36:20 39:17 54:25 64:9 98:23 115:10 117:14 145:7 152:3 187:2 238:7 275:5,9 285:24 286:3,5,7 thanks 161:21 164:9 210:8 theirs 196:13 theoretically 211:8 214:20 215:3,13 theory 210:21 thereof 288:8 thing 40:5 108:14 135:25 151:12 233:14 things 14:15 20:21 22:3 56:13,19,24 70:12 79:11 96:17 150:8 167:22 177:18 183:23 185:14 194:3 203:10 275:24	think 13:21 14:23 24:13 37:19 45:14 67:6,15,18,24 72:20 75:1,9 76:8,24 77:2 79:15 82:2,16 85:1 91:16 92:1 96:9 98:18 100:11 101:3 105:9 112:24 113:3 125:20 127:1 137:20 145:9 156:6 157:23 158:11 166:9 173:14 174:18 174:21 175:1 175:18,24 176:2 178:10 178:13 181:11 182:12 184:24 186:2 189:18 192:8 194:2 200:5 205:16 217:3,13 226:17 228:23 256:13 267:12 267:21 268:4 269:8 273:18 274:10,15 275:19 279:18 280:16 281:11 286:6	third 224:19 242:7 247:21 247:23 251:12 279:4 thomas 100:2 thompson 2:19 thorough 86:9 thoroughly 86:11,15,19 87:7,8 110:15 182:3,7 thought 25:8 37:18,19 177:10,10 204:25 226:19 252:8 thousands 94:21 three 20:9 77:6 80:23 86:20 150:20,24 154:17,24 164:3 168:8 tie 145:9 tim 2:19 time 5:8 12:24 13:23 14:17 23:6 38:2 42:4 42:5 45:22 48:12 50:25 53:8 59:12,15 61:18,19 74:2 89:6 107:19 113:14,25
--	---	---	---

125:12,16,19	228:2 269:19	topics 86:3	82:4,6 86:21
125:23 126:17	titled 55:19	total 49:14	87:12 88:19,22
131:2 133:2	65:11 119:3	totally 210:2	92:16 93:3
135:3 138:6,23	today 11:17	touch 205:23	94:7 106:21
139:18 142:20	12:13,16,19	toward 162:9	107:1 108:20
149:12,16	16:8 29:5,23	162:11	110:2,6,24
154:25 156:20	37:1 39:15	towards 16:15	113:21,22
157:5 162:2	70:5 75:7	263:17	119:5 135:14
170:19 178:18	246:6 271:22	toxic 224:24	135:17 141:18
178:22 179:23	275:7 280:17	toxicologist	161:5,10 173:5
180:24 181:10	together 18:12	281:8	174:5,6,23
184:7 186:6,12	60:25 61:4,20	track 51:21	176:5 184:10
189:4,14,23	62:2,5 101:17	traeger 9:12	201:8 210:5
191:22,25	156:14	trager 9:16	220:4 225:16
194:23 197:23	told 71:10,11	trajectory	228:3 276:24
198:4,18	took 9:24	116:16	278:24 282:18
199:15 200:5	159:10 188:22	transcribed	transported
209:7,11,15,18	243:7 245:12	287:13	53:3
209:24 215:10	257:9,11,12	transcript	travel 20:4
220:17 222:24	tool 105:18,19	11:11 42:20	135:1 186:14
223:2 239:9	105:20 121:3	274:25 288:8,9	191:22
261:15,18	218:4 230:3	transcription	traveled 53:2
274:18 278:13	265:9	287:17	185:12
286:9 287:8	tools 31:9	transdichloro...	traveling 135:8
times 9:6 20:9	top 80:11	188:10	treated 129:25
41:12 54:12	151:24 152:2	transfer 44:13	130:4,8,11
95:21 163:1	153:12 168:8	transient	145:17
233:4,15	170:6 197:1	169:11 170:24	treatment 38:6
266:22 271:22	205:2 246:10	198:11	50:13,15 87:4
272:9,15	247:19,22,23	transport 3:22	114:3,7 115:2
timing 53:1	248:16 251:13	4:2,8,13 5:2	115:13,15,25
title 60:7	268:9 284:25	58:3,11 60:8	117:7 120:5
153:16 157:17	topic 86:1	61:2 65:12	122:12 123:16
203:20 207:18	271:21	68:4 79:20	124:15 126:1,7

126:16 127:4 127:13,18,24 128:7,13,24 129:6 130:3,16 131:3,10,25 138:5 141:24 142:17 143:11 143:25 144:9 144:12 145:2 145:15,15,18 146:13 147:19 148:1,13 149:1 150:22 152:10 153:8 157:2 179:1,15 180:4 220:10,12 224:1 232:5 272:1 280:25 281:16 282:8 284:1 trends 5:25 205:10 230:4 269:21 trial 43:5 194:7 trina 115:6,8 true 134:16 136:13 148:10 169:25 170:3 174:12 211:8 211:17 229:17 271:24 272:7 272:13 275:24 277:11 278:4 278:23 284:20	287:16 288:22 truly 288:9 truncation 235:21 truth 287:10,10 287:11 truthful 12:12 try 10:24 11:24 trying 240:10 280:7 tt 38:3 114:25 123:20 124:9 124:20 138:3 140:22 144:25 150:23 152:13 156:16,17,19 161:25 162:7 162:10,12,17 163:2 168:2 170:14 222:15 224:5 248:9,19 248:24 268:16 268:18 271:18 273:12 tuesday 41:17 turn 16:15 55:17 64:3 72:23 84:2 98:15 103:14 103:17 119:24 145:8 146:17 157:15 161:18 168:4 203:16 204:17 207:14	207:18 221:14 224:5 225:21 228:15 237:3 240:18 241:23 248:15 249:7 250:6 251:10 252:13 262:8 263:6 264:20 270:6 271:16 275:16 turning 63:16 82:10 twice 162:25 two 9:14 20:5 23:20 27:4 43:9 81:5 94:11 103:20 113:17 137:9 141:19 151:16 151:19,20 155:7 168:7 179:9 193:15 199:5 200:1 208:10,16 235:11 247:21 248:4 251:12 263:10 273:23 type 279:23 types 42:1 141:19 200:2 200:17 219:24 typewriting 287:14	typical 31:11 31:14 32:20 33:6 159:19 typically 21:4 33:20 35:2,6 35:15 105:13 177:14 201:3 245:12 277:1 u u.s. 2:10 119:7 120:7 161:6 203:23 224:25 228:5 uh 104:5 168:11 256:17 259:24 unable 12:12 274:22 uncertain 168:17 179:5 uncertainty 33:19,23 34:11 34:16 35:1,15 35:19 36:13 85:18,22 86:5 87:9 88:18 100:14,23 157:12 173:25 175:3 178:18 179:8,13,16,22 180:14 206:15 214:21 215:4 215:14 216:5
--	---	--	---

240:8 280:5 unclear 168:1 uncomfortable 70:24 uncommon 208:7 under 43:10 46:20 122:12 123:16,19 124:15 149:21 157:22 238:18 244:5 246:20 258:1 264:23 275:22 276:3 287:14 288:21 underestimated 243:11 undergone 145:15 underground 23:3 205:22 underneath 120:2 224:18 underpinning 210:21 understand 10:2,10 11:20 11:22 12:9 47:13 63:21 65:17 72:1,5 75:4 84:6 87:19 106:19 114:4 133:4,19 136:10 151:5	154:21 274:21 275:3 understandable 28:25 understanding 16:11 20:25 23:11 24:6 27:23 29:3 32:2 71:24 73:20 77:10 94:10 95:15 119:17 130:21 135:23 136:19 174:4 176:6 183:2 193:24 194:24 204:6 215:25 223:6 223:17,23 230:4 understood 10:19 12:1,10 152:14 182:5 195:2 196:4 undertake 111:7 undertook 66:11 110:16 uniformly 163:4 union 207:12 unique 218:13 219:4,10,22 220:15 278:20 280:9	uniqueness 214:4,13 218:14,17,25 220:22 united 1:1,7,14 7:21,23,25 8:24 13:8 16:19 20:18 21:15 288:22 universities 19:10,13 university 4:17 18:14 19:6,9 19:11,11 21:21 23:13 25:2,3,3 25:4 28:3 55:21 57:12 60:18,24 61:19 101:8 186:18 190:18 192:6 192:17 unknown 121:4 222:3 unlined 46:19 unreliable 96:5 96:9 unsaturated 135:24 unwarranted 172:17 173:10 updated 56:8 67:17 74:4 77:4,12 241:4 244:22 245:6	246:8 250:24 251:6 252:1 updating 67:2 upper 152:11 usdoj.gov 2:12 2:13,13 use 31:12,24 34:16 35:16 39:22 99:3,13 121:19 128:2 144:16 155:11 155:22 156:3 159:6,23 173:20 174:22 175:9 176:18 178:5 181:20 181:24,25 183:16 192:11 193:4 196:6 197:12 199:3 200:22 202:24 205:16 206:19 208:11,12 210:15 211:25 218:20 228:20 229:6 257:22 281:19 used 20:22 22:8 30:16,20 31:8 32:10 49:18 62:17 87:24 95:18,23 96:16 98:2 113:19 118:18 121:2
--	---	--	---

121:13 122:3	58:19 88:22	valley 44:21	variability
123:3,3 129:24	107:14 112:7	45:3,21 144:6	87:10 160:8
141:16 143:14	112:18 113:7	196:23	170:9 218:11
145:24 150:25	117:17 118:3,8	valleys 44:7,17	238:15,16
151:4,6 154:10	147:4 160:5	valuable 95:9	239:8 240:6,9
156:25 160:21	162:19 163:1	95:13 96:10	246:5 277:1
163:18,20	163:23 164:3	97:4,11,15	278:11 280:2,6
164:24 165:1	182:19 184:6	105:17 174:24	280:13
167:25 168:14	198:2,3 202:22	182:15	variable 274:6
173:23 183:20	208:25 225:13	value 35:23	variance 116:9
183:24 193:1,6	232:7 237:15	151:6,8 158:3	116:11 171:23
195:19 200:9	241:4 245:16	158:6 172:22	250:20
200:10 206:21	248:18 254:2	212:1,7,13	variation 87:2
209:9,24 211:4	265:6 276:6,15	226:7 243:7,8	120:6 143:3
223:8,19 227:4	277:5,12 278:5	243:18 246:1	180:9
227:15 230:23	278:8	247:9 248:11	variations
240:14 244:13	utah 1:15,17,18	251:23 253:4	36:19 238:24
244:17 246:13	7:14 8:20 25:3	255:14,17,22	239:10,24
248:9 249:22	25:3 287:2,6	256:3 257:12	240:13 277:18
259:19 265:14	287:23 288:4	257:17,24	278:14 279:11
266:6 271:25	288:22	260:25 273:8	varied 108:5
280:19,20,22	utero 191:3	284:4,10	170:16
281:6,12	225:3	values 35:23	varies 107:16
useful 37:19	utilized 62:8	38:3 150:21,25	270:18
95:14 104:17	v	151:10,10	variety 135:12
210:13 218:3	vadose 135:8	154:17 158:18	142:19 185:25
user 63:2	135:17,23	158:25 159:1	various 258:15
usgs 190:13	vaguely 14:16	159:18 163:23	vary 109:5
192:8,15,18	15:12	164:4 167:25	171:14 239:1
193:6,9,14,16	valid 176:4	171:22,24,25	277:20
193:18,24	validity 171:6	203:21 204:2	varying 108:25
196:7,13,25	182:18	216:6 233:3,13	150:19
using 26:5		241:4 244:6,9	vegas 43:22
50:20 56:10		255:19 274:3	44:2,9

verbally 10:15 verified 145:21 version 40:3 152:6 259:6 285:22 versions 35:20 103:2 241:1 versus 21:11 37:25 38:3 91:2 116:5 128:8 141:14 171:24 204:2 209:24 234:20 245:13 252:9 252:11 263:23 285:14 vertical 155:25 vetted 182:3,8 182:13 vi 241:24 vicinity 119:7 161:6 162:17 228:5 vickie 1:16 7:16 287:4,23 288:2 video 7:19 videographer 2:15 7:3,16 8:5 59:11,14 149:11,15 207:15 222:23 223:1 261:14 261:17 286:8	videotaped 1:11 vii 204:21 vinyl 172:15,24 vis 5:12 visited 187:18 visualization 63:9 visually 234:20 250:2,20 vocs 224:22 225:4,17 voicemails 17:3 17:23 volatilization 128:16 129:5 129:18,20 130:6 148:5 vs 1:6	wants 39:19,24 warrant 117:10 118:14 warranted 163:13 211:2 washington 2:11 watch 202:15 watched 42:22 267:1 watching 266:22 water 1:4 5:6 5:18 7:8 8:25 13:8 14:5,13 14:19 21:3,5,8 21:10,11,12 22:22,24 28:16 28:18 38:5 43:8,17,24 44:1,9,16 45:1 46:22 49:4,8 49:10 50:6,9 50:11,12,14,19 51:21 52:1,13 52:24 68:11 70:6 87:3,4,13 89:8 114:2,2,2 114:7,7 115:1 115:2,13,15,25 117:7 119:6 120:5,5,6,22 122:11 123:16 124:14 126:1,6	127:3,13,18,24 127:25 128:1,7 128:12,20,21 129:25 130:2,4 130:8,11,15 131:2,10,25 134:8,8,16 135:7,9 138:3 138:4,5 141:24 142:3,17,19,21 143:11,23,24 143:25 144:8,9 144:11,13,24 145:1,2,3,14,15 145:18,18,20 145:24 146:13 147:3,25,25 148:18 150:22 152:10 153:8 157:2 161:5,24 163:2 168:16 170:7 172:8,9 172:21 176:25 179:1,15 180:4 190:22,24 191:4 192:11 192:14 195:20 195:25 196:20 197:3,4,8,18,20 198:3,4,17 199:12 200:3,6 201:5,17 202:14,14 203:22 204:7
	w		
	w.r. 188:12 wait 11:3 132:25 215:22 walk 27:14 want 38:21 40:4 64:24 115:7,9 141:11 150:9 151:21 166:22 181:11 181:15 201:17 280:19 wanted 281:18		

209:6,12,25 212:3 220:8,9 220:12 224:1 225:5,17 226:4 227:7,15 228:4 228:9,21 229:7 232:5 248:19 272:1 280:25 281:15 282:8 284:1 288:1 water's 52:4 watermodeling 119:13 146:6 161:15 227:24 way 63:18 66:4 74:20 102:8 119:18 154:20 160:11 182:21 214:12 243:6 253:6 267:10 ways 34:25 202:10 206:22 208:23 234:18 239:2 277:21 we've 57:5 74:11 109:24 171:16 178:9 232:2 269:1 271:4,21 web 172:25 187:16,22,23 187:25 website 186:1 187:13 199:7	213:15 wednesday 41:16,20 week 41:16 151:19 weeks 16:4 109:16 180:25 weight 46:9 weighted 147:6 147:17 148:3 weights 144:18 weitz 2:4 weitzlux.com 2:6,6 wells 21:13 22:9 44:6 45:2 46:22 49:4,10 50:12,17,19,22 51:23 52:13 87:4 114:13 116:24 126:3,8 126:14,22 127:15 129:3 141:14,22 142:20,21 143:22 144:11 145:4 147:23 148:19 157:4,6 179:3 180:6 185:13 186:12 188:15 189:3 189:13,23 190:21 191:20 191:25 193:20	193:21 195:14 195:16 196:20 197:9,21 199:5 199:6,6,20,21 200:7 203:22 208:6,8 209:13 209:13,16 220:9,14,18 240:7 242:14 252:22 272:6 274:8 280:4 283:8 went 45:6 200:6 281:13 whereof 287:19 white 219:10 wide 185:24 216:6 widely 82:21 83:19 92:24 wider 140:23 widespread 158:11 william 94:7 williams 2:18 17:11 willing 59:5 70:2 169:17 171:5 willis 46:9,14 46:24 47:6,9 48:24 50:1 wilmington 258:23,24	wish 48:14 274:13 witness 8:7,9 13:7,13 15:4 31:22 32:25 33:9 34:2,15 34:24 43:11 44:20 45:23 46:1,5,12 47:25 48:21 51:20 52:21 53:14,22 54:7 54:13 56:23 57:4 58:14 59:2,7,10 67:23 68:8,16 68:25 69:17 70:1,11 71:6 72:10 73:13 74:9,17 76:1,8 78:9 79:2 81:15,24 82:15 83:1,15 90:16 91:9 93:8,15 93:23 95:8 96:8 97:8,14 100:11 101:3 102:7 103:9 106:9 107:4,12 110:9,19 112:13,24 115:11 117:20 126:25 129:9 131:8,15
---	---	--	--

132:19 133:5,8 134:4,20 136:9 137:7,20 138:13,18 139:2,21 140:3 141:1,11 144:3 148:8 149:5,10 150:13 158:14 159:8 163:16 164:2,23 168:24 169:17 171:10 173:14 174:17 175:15 176:10,17 182:11 183:10 189:8,18 190:3 194:2 201:14 202:8 208:20 210:24 211:14 213:4 215:1,9 215:19,24 217:3,11,20 218:7 221:9 223:11,15,22 226:16,21 230:17 231:3 231:16 232:1 232:18,25 234:2 237:1 256:13 266:4 266:11 267:8 267:18 268:1,8 269:2,8 272:18 275:8,9 281:25	283:21 285:6 286:1,5 287:9 287:19 288:3,7 woburn 185:7 185:15 186:1 187:8 189:1,12 189:21 191:1 193:11 195:9 196:21 200:12 woessner 94:8 95:3,22 98:21 98:22 99:4,8,9 women 225:8 word 184:4 188:4 205:4 221:22 224:18 224:19 270:10 words 10:14 107:24 154:9 281:17 work 19:5,24 23:4 24:4 26:14 27:11 37:21 45:20 47:9,10 56:23 61:4,20,23 87:20 88:12,24 90:19 91:2,3 91:10 115:18 176:19 181:17 182:25 192:4 209:12 219:19 281:1 282:22 285:12	worked 60:22 60:25 61:4 101:16 194:18 working 26:7 101:6 workload 61:21 works 42:1 workshop 20:5 workshops 56:23 world 103:11 271:3 worse 247:9 273:15,21 write 20:6 47:10 writing 79:4,12 84:14 177:10 written 28:9 67:5 93:17 wrong 104:17 105:10 106:6,9 117:5,12 179:20,23 226:12,18 228:24 wrote 44:24 61:8 163:17 187:23 238:22 239:8 276:3 277:16 278:12 279:6 280:3	wtp 147:3 www.atsdr.c... 172:25 wyoming 25:4 x x 3:2,12 249:13 y y 156:3 249:11 yeah 14:10 21:4 25:22 26:22 27:19,22 31:16 33:18 34:8 37:6 40:24,24 44:23 47:23 48:16 49:8 53:9 58:15 63:14 65:2 68:16 79:18 97:15 98:24 105:15 108:11 112:2 120:13 124:18 125:20 126:25 128:4 130:19 133:11,21 135:2,5,25 137:14 143:16 144:3,22 151:12 152:2 152:18,19 153:22 154:22 157:21 160:3 160:12 174:17
---	---	--	---

184:19 185:5	young 4:16
187:23 189:18	25:2 55:21
192:10 196:16	60:17,18
196:19 199:4	z
201:15 208:1	zero 220:5
210:24 227:2	257:10
234:16 256:13	zone 135:9,18
year 9:14 19:23	135:23,24
20:2 27:6	zoom 2:16
37:11 51:2,4	42:22 266:14
104:10 137:14	zooming
225:4 259:23	200:11
260:6,15,16,21	zuckerman
261:4	104:7
years 9:14	
18:11 23:21	
44:12 45:6	
46:2 48:7,15	
57:16 58:17	
60:23 79:19	
139:4,9 156:15	
177:12 179:17	
180:12 186:17	
206:7 208:10	
208:16 209:17	
yep 152:4	
222:7 223:13	
yesterday	
42:22 266:15	
yielded 112:8	
112:19	
yields 162:4,23	
york 2:5,5	